

Public consultation: Draft guidelines for the 5+1 internship program

The Psychology Board of Australia (the Board) is seeking your feedback on the development of the *Draft guidelines for the 5+1 internship* (draft 5+1 guidelines). There are ten specific questions we would like you to address below. All questions are optional and you are welcome to respond to any that you find relevant, or that you have a view on.

Providing feedback

Please email your submission to: psychconsultation@ahpra.gov.au. The submission deadline is close of business on **Wednesday 2 July 2025**.

Initial questions: To help us better understand your situation and the context of your feedback, please provide us with some details about you.

Question A: Are you completing this submission on behalf of an organisation or as an individual?

☒ Organisation

Name of organisation: Flinders University

Contact email: [REDACTED]

☐ Individual

Name: [Click or tap here to enter text.](#)

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Question B: If you are completing this submission as an individual, are you:

☐ A registered health practitioner?

Profession: [Click or tap here to enter text.](#)

☐ A consumer / client?

☐ Other – please describe: [Click or tap here to enter text.](#)

☐ Prefer not to say.

Questions for consideration – Updating the Guidelines for the 5+1 internship program
Preferred option
Question 1: Do you support the Board's preferred option (option 2) to update the 5+1 guidelines? Please provide reasons for your view.
Your answer: Yes. This will enable the guidelines to be consistent with the updated competencies and reduce administrative and regulatory burden.
Question 2: Are you in support of including the updated competencies as outlined in the Professional competencies for psychologists into the draft 5+1 guidelines? Please provide reasons for your view.
Your answer: Yes. As above.
Question 3: Do you agree with the proposed changes to the requirements of the 5+1 internship (refer to Table 1)? Please provide reasons for your view.
Your answer: We support the following changes: - 1,360 hours removed from the guidelines: - o Agree that specifically mentioning the hours is unnecessary. - 80 hours supervision from a BAS without delineation of how those hours are comprised will enable supervisors and provisional psychologists to determine the most effective methods depending on need. It is also agreed that culturally informed supervision should be explicitly stated as included. - Logbook submission: - o Agree that regular submission is an administrative burden and it is sufficient to retain a copy to be produced on request. - Case reports: - o Agree that these can be a good learning tool, however also agree that these competencies are assessed in the 5th year of study and therefore is unnecessarily replicated in the internship year. - Change in terminology from 'professional development' to 'education and training activities': - o Agree We have the following suggestions in respect to the following proposed changes: - Progress reviews not required to be submitted at the 6-month mark (although progress reviews are to be completed throughout and can be requested): - o Although we acknowledge that from a regulatory standpoint it was rare for progress reports to raise concerns, we have concerns that issues raised only at the end of the internship year do not allow for appropriate remedial action throughout the year and that there was a very real possibility that very few issues were raised BECAUSE of the regulatory requirement. The submission of a 6-month progress report provides for some level of accountability (rather than complete autonomy by the BAS) and affords a level of protection to the intern and BAS. In addition, the provision of a 6-month progress report is commensurate with the reporting requirements for practice

endorsement during the registrar term (e.g. a mid-progress report for clinical registrars).

- Removal of the specified number of hours of professional development from 60 prescribed hours where the principal supervisor determines the number of hours:
 - o We submit that completing a requisite number of hours (whether it be 60 or a revised number) as a provisional psychologist is more consistent with requirements that will need to be met when a registered psychologist and is good practice. In addition, while there are a large number of BAS who will ensure that education and learning activities are built into the internship year, interns are still a more vulnerable population operating within an inherent power differential in their Internship. The Board's role as a regulatory body adds value and potential protection when hours are both specified and reported against. It is submitted that a reduction in hours, commensurate with the CPD requirements for registered psychologists could be considered (i.e. 20 hours).

Content of the draft 5+1 guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the **draft 5+1 guidelines**?

Your answer:

Other than the responses above in Question 3, there are no other suggestions for changes, deletions or additions into the guidelines.

Question 5: Is the language and structure of the proposed **draft 5+1 guidelines** helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer:

The language of the proposed guidelines is clear, relevant and workable. The unintended consequences are covered in the response to Question 3 and Question 7.

Proposed implementation of the draft 5+1 guidelines

Question 6: If the changes are approved, the Board proposes to publish the **draft 5+1 guidelines** in advance and have a future date for when it comes into effect (1 December 2025) to allow enough time for provisional psychologists, supervisors and internship providers to prepare. Are you in support of this transition and implementation plan?

Your answer:

We submit that the time frame appears reasonable and will enable graduates of the 2025 5th year to commence their internship year under clear and consistent guidelines. We wonder though about the application of the changes to current interns and whether and how the proposed changes will affect existing interns. Operating under two systems would appear unnecessarily disadvantageous to interns who would be part way into their internship year as of 1 December 2025. It is submitted that the new guidelines apply to all interns irrespective of when they commenced their internship year.

Potential impacts and benefits

Question 7: Are there specific impacts for supervisors, provisional psychologists, internship providers, international regulators, governments, employers, psychologists, clients/consumers or other stakeholders that the Board should be aware of, if the **draft 5+1 guidelines** were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

As noted in Question 3, while there are significant positives in the proposed changes to the guidelines, including allowing more autonomy for decision making between the BAS and the intern, we submit that some regulation should remain in order to protect the intern (i.e. submission of a 6-month review and specification of education and training hours). While there are a large number of BAS who will or would 'do the right thing' even in the absence of regulation, there are also BAS who 'do the right thing' *because* of regulation. We submit that there should be a greater balance in the proposed guidelines between supervisor autonomy and supervisor accountability.

Question 8: Would the proposed changes to the **draft 5+1 guidelines** result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them (see Appendix A of the preliminary consultation paper for more detail).

Your answer:

We believe that Aboriginal and Torres Strait Islander people and other priority groups and their peak bodies who will be specifically consulted are better placed to respond about any potential negative or unintended effects.

Question 9: Can you identify any other benefits, costs or regulatory impacts for practitioners, clients/consumers or other stakeholders from the proposal? If yes, please describe them (see Appendix B of the preliminary consultation paper for more detail).

Your answer:

Nil addition to what answered above.

Other

Question 10: Do you have any other feedback or comments about **draft 5+1 guidelines**?

Your answer:

Thank you for the opportunity to make comment. We welcome the majority of the proposed changes to the draft 5+1 guidelines and look forward to their implementation at the end of the year.