

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: The Australian Association of Psychologists Incorporated (AAPi)

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:

We largely support these changes but do have some concerns with some of the proposed changes. Making the 5+1 program less onerous will be a benefit to all who go through a very intensive program, however we do have some concerns about unintended consequences for changes such as removing the requirement for case reports, oversight of supervision logs and increased flexibility of supervision requirements.

There are concerns that reducing the rigor of the 5+1 internship may have unintended consequences for the way that psychologists who register through this pathway are viewed by the profession and the public. We stress the need to retain the view that these psychologists are highly skilled, competent across all areas of competence, credible, and highly respected.

With the recent retirement of the 4+2 pathway after it was argued that that pathway was "no longer fit for purpose", the revision of the 5+1 pathway must continue to ensure that the graduates who complete their registration via this method have the same skills and proficiencies as any graduate from any other pathway, including a Clinical Masters. The minimum standards for registration are remaining the same, so the summative assessments ensuring the standard of skills therefore also needs to remain on par, even if flexibility regarding timeframes is introduced.

As the Psychology Board is aiming to streamline the entry pathways for psychologists and simplify the post-graduate qualifications in the next 5 years, changes that are made now could unintentionally and negatively impact on those future streamlining changes. We would be concerned about reducing the credibility and efficacy of this pathway now, which could lead to it being further cut in the future, resulting in fewer graduates in a dwindling workforce.

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, provisional psychologists need to meet the same standard of competency as the rest of the profession. This is threshold competence that is required of every psychologist.

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:

Current requirements	Proposed requirements	AAPi position
1,500 total internship hours	NO CHANGE: 1,500 total internship hours	Agree. The current hours are appropriate and required to meet competence.

1,360 hours supervised practice In a Board-approved role as per the internship plan.	CHANGE: 1,360 hours removed from the guidelines	Disagree. This decreases the rigor of the program and has the potential to increase the risk posed by provisional psychologists working without adequate training and supervision arrangements in place. This also risks creating further division in the workforce, and could continue to hinder or create barriers to job opportunities for graduates.
500 hours of client contact. 60 of these hours may be skills acquisition activities, including simulated learning.	NO CHANGE	Agree. The current hours are appropriate and required to meet competence.
80 hours supervision from a Board-approved supervisor Minimum 50 hours must be individual supervision with the principal supervisor. 70 hours must be direct (real-time communication between intern and supervisor). No more than 20 hours through non-visual communication e.g., telephone. Up to 10 hours may be indirect (asynchronous) supervision such as written feedback. One hour of supervision per 17 hours of psychological practice.	CHANGE: 80 hours supervision from a Board-approved supervisor Minimum 50 hours must be individual supervision with the principal supervisor. The supervisor and provisional psychologist are to determine the most effective methods to complete the required supervision. 80 hours of supervision equates to approximately 1 hour of supervision for every 18 hours of practice. However, the frequency of supervision is determined by the supervisor. For those provisional psychologists who identify as Aboriginal and/or Torres Strait Islander, culturally informed supervision may be counted towards their 80 hours of total supervision	Disagree. We are concerned about the proposed change regarding the supervisor and supervisee determining the most effective method of supervision, as without minimum requirements for in person or face-to-face supervision there is a risk of inadequate or inappropriate supervision which does not adequately ensure graduate outcomes. Minimum requirements of frequency of supervision ensures supervisees can be held accountable in meeting these requirements, and ensures that they are practicing safely and effectively. To not have this requirement means that supervisees may be practicing unsupervised and thus potentially posing a risk to the public. We would also like it to be clarified in the guidelines regarding the standard required for supervision of provisional psychologists who identify as Aboriginal and/or Torres Strait Islander receiving culturally informed supervision. Does this need to be provided by health practitioners/recognised elders/etc? With this not being defined well within the guidelines there is a risk that supervision will not meet the standard required for safe practice. It may also be useful to extend culturally informed supervision to other provisional psychologists working within First Nations and other communities. If all

		supervisors were to undergo mandatory cultural responsiveness training, this would ensure that there is equity across the board for all provisionals.
60 hours of professional development	CHANGE: Professional development changed to education and training activities CHANGE: Hours not prescribed by the Board References to professional development (PD) are removed from the guidelines and replaced with education and training activities. This title more accurately reflects the nature of the activities, as provisional psychologists are still developing their competence. There is no minimum amount of education and training activities required. The principal supervisor will determine the number of hours required to meet the professional competencies, including demonstrating a health equity and human rights approach when working with Aboriginal and Torres Strait Islander peoples, and diverse groups.	Disagree. This component appears to be being subsumed into other areas of the guidelines. If there is crossover or unnecessary duplication of hours (e.g. "education and training activities" potentially overlapping with "skills acquisition" as part of direct client contact) then there may be scope to make this more efficient and less onerous on provisionals and their supervisors. Continuing professional development (or "education and training activities") is a requirement of all psychologists and the expectation should be consistent across pathways. Utilising consistent language across training pathways and into registration would enable a more universal understanding of expectations and requirements, rather than having to define / delineate one from the other. This proposed change puts too much responsibility to the supervisor who would not be seeing the supervisee consistently according to the guidelines. The risk is considerable if there is no minimum standard. Consistency of 30 hours of CPD activities annually would be appropriate as this is the standard that will be required once general registration is attained. We are also concerned with there being no maximum hours. This means that provisional psychologists could "game the system" and do a very high number of education hours in place of actual practice/direct client contact ("skills acquisition" instead of client contact hours).

		There is also a time management risk, where provisional psychologists may not plan their internship hours appropriately, and attempt to rush through a high number of supervision and CPD hours at the end, which could delay their completion, and put an unnecessary financial burden on the provisional.
Direct Observation Eight sessions are directly observed by the supervisor during the internship year. Four sessions must be psychological assessments and four must be intervention sessions.	NO CHANGE	Agree in part. Is there a timeframe that these observations should be conducted every 6 months as currently required? With the changes to the official reporting that is required this is not clear in the guidelines. Frequent direct observations are required in order to ensure safe and effective practice. It is also unclear if the provisional psychologist takes longer to complete their program if they will be required to have more observed sessions. If this is not the case we would like this amended to ensure it occurs.
Logbooks A logbook (record of supervised psychological practice, supervision, and professional development) is to be submitted to the Board with the six-month progress report/s, the final assessment of competence, and at any other time if requested by the Board.	CHANGE: Logbook submission requirements Logbooks are required to only be submitted to the supervisor(s) however the Board can request submission of the logbook at any time. A logbook is to be kept until general registration is approved.	Agree. Logbooks are important for ensuring oversight over the practice of provisional psychologists.
Six-month progress reports Principal supervisor: evaluation of progress. Provisional psychologist: critical self-reflection on progress. Submitted within 28 days of the end of each six-month period.	CHANGE: Progress reviews Progress reviews should be undertaken with the principal supervisor during the internship. The frequency and format of these reviews is determined by the principal supervisor. The Board can request submission of progress reviews at any time.	Disagree. It is important that there are regular checks on the practice and progress of provisional psychologists. The six monthly reviews are important to ensure that provisional psychologists are on track and practicing safely as well as ensuring that there are means for addressing practice issues and communicating this with the Board. Without this oversight we believe there may be a risk of more official notifications against provisional psychologists by their supervisors due to significant non compliance with

		supervisor direction. If less rigorous reporting is desired by the board, there are opportunities for a midway reviews and regular reviews to ensure progression. This puts additional burden on the supervisor to determine how frequent reviews should occur, rather than it being regular and consistent. There is also the potential for the Board requesting submission of progress reviews where none or an inadequate number have occurred. This is both a risk to the provisional as well as the supervisor, if they have not had the opportunity to pick up on issues with the provisional due to infrequent / irregular supervision.
Case reports One assessment and one intervention case study from a pool of four developed during the internship. Submitted to the Board at any time during the internship, after a review by the principal supervisor. It is recommended one is submitted within the first 770 hours, and one in the second 770 hours of the internship.	CHANGE: Case reports not required While case reports are a good learning tool, they are no longer required to be completed or submitted to the principal supervisor or to the Board for assessment.	Disagree. Many programs require submission of case reports in order to ensure a high standard of written communication as well as appropriate clinical skill demonstration. Case formulation and reporting are also core skills in everyday psychological practice, and we believe this should be retained but the requirement for the board to assess them should be removed if the oversight of this by the board is too onerous. The high standard of training for board approved supervisors is sufficient to allow them to mark these assessment pieces.
Final assessment of competence Principal supervisor: Evaluation of competence. Provisional psychologist: Critical evaluation. To be submitted at the end of the internship, after the National Psychology Exam has been passed.	NO CHANGE	Agree. This is appropriate to remain in place and important to ensure the high standard of competence required and maintain the standing of all psychologists progressing through this pathway.
Approval of work role and internship plan by the Board Internship plan to be completed by the provisional psychologist and supervisor(s) and submitted to Ahpra.	NO CHANGE	Agree but we would like to see this process streamlined to reduce disruptions to the progress of provisional psychologists. Currently the process takes too long and

		means significant delays for provisional psychologists.
Minimum time to complete: 44 weeks	NO CHANGE	Agree this is an appropriate timeframe.
Maximum time to complete: 5 years	NO CHANGE	Agree this is an appropriate timeframe.
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: Yes: - Supervisors and supervisees need to understand that a significant amount of written work and assessments (similar to case presentations and case formulations) need to be completed during the period of supervised practice. - It needs to be clearly communicated that regular and frequent supervision is required and that long breaks between supervision is inappropriate. - We would like to see maximum timeframes for the period between formal supervision sessions so that provisional psychologists are not practicing unsupervised. We would like to see the process for approval of work role and internship plan by the Board to be streamlined to reduce disruptions to the progress of provisional psychologists. Currently the process takes too long and means significant delays for provisional psychologists. Changes to the form required so that it is less onerous would be appropriate so that only essential detail is included for the board to check and approve. This would reduce the administrative burden while still providing adequate oversight. We also believe that if a provisional psychologist already has an approved arrangement in place such as an AWOP-76 that this be easily transitioned into an internship placement with a letter from the supervisor or similar with approval being seamless by the board. This will allow for continuity of care of the client group and less administrative burden for the board. - We would also like to see procedures for dealing with inadequate compliance by provisional psychologists. Due to the increased compliance burden for supervisors, there needs to be mechanisms within the guidelines for supervisors to address non-compliant or substandard behaviour of provisional psychologists. Without this, supervisors will use notification processes which may not be the best approach to ensure timely rectification of issues and a high standard of practice of provisional psychologists. - We would also like to see requirements for regular progress reviews, regularity of supervision, more direct observation if the provisional psychologist takes longer to complete their program, and review of the minimum client contact hours. Without this, it will be difficult to catch issues with practice early enough.		
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: Yes the language and structure of this is helpful and clear. We also suggest a detailed implementation plan in collaboration with the peak bodies to include supporting educational materials like webinars for both supervisors and provisionals to attend to be delivered by Ahpra to make communication of these changes accessible.		

The intention of reviewing the guidelines appears to be to streamline the internship arrangement, however it needs to be emphasised that these changes will not denigrate or appear to lessen this pathway, compared to other, similar pathways.

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:

Yes. We do believe that many providers and private practice owners might need support to effectively implement and understand these changes as they are significant, and for many supervisors who have been working with students for some time – this will be an adjustment. The timeframe may need to be extended, or it may need to only be applied to future cohorts. Education and supports will need to be available to assist supervisors with this transition.

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 identified in the draft document, if the draft 5+1 internship guidelines were to be approved, various stakeholders would experience both positive impacts and potential negative or unintended consequences.

Supervisors

Positive Impacts:

- Alignment with updated professional competencies ensures supervised practice is relevant to current psychology practice.
- Potential improvements in the supervisor training process, reducing administrative burdens.
- Less delays waiting for case studies to be marked before sending more in.

Potential Challenges:

- Changes may require additional training for supervisors to comply with new expectations.
- Risk that interns may not comply with completing or providing log books if they are aware that they only go to the supervisors.
- Risk that non-compliant behaviour of interns may be more difficult to manage without current levels of board oversight.
- With provisional psychologists not having mandated frequency of supervision this may increase legal risk of supervisors who are considered accountable for the actions of provisional psychologists under their supervision.
- Harder to pick up practice issues as soon as is possible now with less oversight required.
- Delayed detection of significant issues.
- Risk that interns will go for longer periods unsupervised.
- Risk that interns will remain practicing unchecked if 6 month reports are no longer required.

- More subjective assessment required by supervisors rather than formalised assessments that are regular.
- Supervisors feeling unsupported by the board in managing provisional psychologist practice issues.
- Quality of supervision becomes the primary protective measure so some poorer quality supervisors allow entry to the profession for provisional psychologists who need further training.
- Highly variable expectations of supervisors leads to variable outcomes.

(5+1 Interns)

Positive Impacts:

- Alignment with contemporary practice may improve employability and skill readiness for general registration.
- Less administrative requirements may reduce stress regarding completing the program.

Potential Challenges:

- Changes in competencies or internship structure may create transitional difficulties for current interns in the pipeline.
- Potential for undertraining or practice issues to continue unchecked.
- Imbalance of practical learning leading to lower levels of competence in clinical management of clients.
- Insufficient supervision and poorly managed internships are significant risks under the proposed changes.
- Highly variable expectations of supervisors leads to variable outcomes.
- Delayed commencement of practice if processes for approval of internships is lengthy as is the current norm.

Higher Education Providers

Positive Impacts:

- Updated guidelines ensure that coursework components align with the latest professional standards.
- May provide more clarity on what aspects of training should be emphasised before the internship year.

Potential Challenges:

- If requirements change significantly, universities may need to adjust their curriculum, which could require additional resources and accreditation approvals.

Accreditation Agencies

Positive Impacts:

- Ensures accreditation processes reflect the most current professional competencies.

Potential Challenges:

- The transition to new guidelines may require updating accreditation frameworks, requiring additional work and consultation.

Governments and Employers

Positive Impacts:

- A more competent and better-prepared workforce benefits the public health system, private sector, and community services.

Potential Challenges:

- If the changes make the 5+1 pathway less accessible or more costly, it could exacerbate workforce shortages, particularly in rural and underserved areas.

- Employers may need to adjust supervision structures.
- Higher volume of notifications to Ahpra to manage provisional psychologist non-compliance with direction and practice issues. This creates a very reactive system rather than the proactive system that is currently in place.
- Decreasing regulation and oversight checks could have reputational impacts on the 5+1 pathway, which could seem less rigorous than other pathways, making it seem “easier” or inferior to similar pathways.
- Loss of confidence in the sector.

Registered Psychologists

Potential Challenges:

- If the transition is not well communicated, there could be confusion about the competencies and expectations of 5+1 graduates.
- Lowered credibility of psychologists trained through this pathway.
- Loss of confidence in the sector.

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:

The proposed changes could have unintended negative effects on Aboriginal and Torres Strait Islander Peoples, disabled individuals, carers, and other priority groups, particularly in terms of accessibility and workforce representation. Aboriginal and Torres Strait Islander students and psychologists already face systemic barriers in training and employment, and if the changes do not include culturally responsive supervision and support structures, this could further limit the number of Indigenous psychologists in the workforce, widening the existing gap in culturally appropriate mental health services. To mitigate these risks, the Board should consult directly with affected groups, ensure financial and structural supports remain accessible, and embed cultural safety and disability inclusion principles within the guidelines.

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:

Yes, we identify several additional benefits, costs, and regulatory impacts for practitioners, clients/consumers, and other stakeholders arising from the proposal. While there will be less cost and time burden for the Board, there may be increased costs with regulatory action needing to be taken for non-compliant behaviour of provisional psychologists whose supervisors have less capacity to take action through the processes that exist currently and will be removed with the changes. The burden of responsibility and legal liability will now fall to supervisors who will need to strongly consider this in relation to their insurance and business practices. This may increase the cost to provisional psychologists if significant changes are needed for supervisors and the cost of providing supervision services needs to increase to allow for this. The income of supervisors may also be highly variable if provisional psychologists are not required to have regular and frequent supervision. This may see more supervisors leave the market for more consistent income producing activities and there is already a shortage of Board Approved supervisors in the sector.

Other

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

Your answer:

Supervisors require avenues for reporting or getting assistance from the board when there are issues that arrive in the practice regarding the compliance of provisional psychologists to the guidelines. These need to be built into the guidelines so that there is not an increase in liability for supervisors or an increase in notifications seen for provisional psychologists. We would have preferred a higher level of consultation and co-design of these guidelines with the sector so that these new guidelines could be changed with appropriate input from those who would be impacted by the changes.

We would like to see free updated training provided for supervisors so that the changes are easier to implement if they must go ahead and would like changes to the approval of practice forms and seamless transitions from AWOP arrangements into internship placements to allow for continuity of care for clients.

The Board must also seriously consider the reputational impact on 5+1 psychologists and the pathway's program as a whole, should the existing requirements be revised down. We know that unfortunately graduates of the 4+2 program and that program as a whole have continually been denigrated and considered inferior, particularly now that that pathway has been retired and deemed "not fit for purpose". Continuing to feed into a two-tier system, rather than ensuring that all psychologists graduate with the same competencies, have gone through similar, rigorous pathways, and could then have the same work opportunities as their colleagues who have completed a 2-year masters program, lowers the esteem of the workforce and presents challenges to the profession as a whole.