

Public consultation

May 2025

Updating the guidelines for the 5+1 internship program

The Psychology Board of Australia (the Board) is seeking public feedback on the review of the guidelines for the 5+1 internship program.

Providing feedback

If you wish to provide **detailed feedback** or are providing feedback on behalf of an organisation, please complete the feedback submission template at Attachment B and submit the form by email to: psychconsultation@ahpra.gov.au. The questions in the submission template are also listed on page 13 of this consultation paper.

If you wish to provide **brief feedback** you can use the online consultation survey. This form is based on the 'questions for consideration' that are listed on page 13 of this consultation paper. The question format (mostly multiple choice) means there is minimal opportunity for written feedback.

The submission deadline is close of business **2 July 2025**.

Publication of submissions

The Board publishes submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is requested.

Next steps

We will review and consider all feedback from this consultation before making decisions about the updated 5+1 internship program guidelines.

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Overview

1. The Psychology Board of Australia (the Board) is one of 15 national health practitioner boards established under the [National Registration and Accreditation Scheme](#) (the National Scheme). All national health practitioner boards must set national standards of practice for the registration of individual health practitioners.
2. We work in partnership with the [Australian Health Practitioner Regulation Agency](#) (Ahpra) to regulate psychologists for the protection of public health and safety. As part of our regulatory functions, we ensure that only psychologists meeting minimum standards are registered.
3. We regularly review our standards, guidelines and policies to ensure they remain relevant and effective. The [Guidelines for the 5+1 internship program](#) (the guidelines) were issued in 2013 and have not undergone a major review since then. While we generally review guidelines every five years, the Board decided to wait for the last cohort of the 4+2 internship program to begin (see: [Retirement of the 4+2 internship program](#)) and for the threshold professional competencies to be updated (see: [Professional competencies for psychologists](#)). This paper outlines proposed updates to the guidelines to bring them in line with changes in the regulatory context, and to ensure they are aligned with contemporary psychology practice.
4. The purpose of the guidelines is to:
 - a. outline the requirements of the 5+1 internship program (the internship program) including describing the aims, entry requirements and completion pathway for the internship, and
 - b. guide provisional psychologists and their supervisors through the internship program by detailing the standards and responsibilities of the supervisory arrangement.
5. The purpose of revising these guidelines is to conduct a full review of the internship requirements and administrative rules to:
 - a. ensure the guidelines are aligned with contemporary psychology practice by including the recently updated [Professional competencies for psychologists](#) into the internship program,
 - b. better align the internship program requirements with the contemporary regulatory context,
 - c. reduce the regulatory burden and complexity of the internship program, and
 - d. generally update the language and structure of the guidelines to improve readability.
6. We are seeking your feedback on whether to continue with the current 5+1 guidelines with no changes (option 1) or to refresh the guidelines as noted above (option 2). We are asking you to choose your preferred option and to answer specific questions about the proposed draft guidelines (listed on page 13). This paper provides background and information about the Board's proposal.

Background

Pathways to general registration

7. The requirements for general registration as a psychologist in Australia include completing a six-year sequence of education and training. There are two pathways to general registration. These pathways are:
 - a. the 5+1 internship pathway, which involves completing five years of a [Board-approved program of study](#) in psychology, the completion of a one-year internship program, and passing the national psychology exam.
 - b. the higher degree pathway, which involves completing a six-year sequence of a Board-approved program of study in psychology – a four-year undergraduate followed by a postgraduate degree of two or more years.
8. A third pathway, the 4+2 internship program, was closed to new applicants in June 2022. The retirement of this pathway will take effect on 1 January 2029 (see paragraphs 18 to 22 for further information). The 4+2 internship involved completion of four years of a Board-approved program of study in psychology, the completion of a two-year internship program, and passing the national psychology exam.

History of the 5+1 internship program

9. The 5+1 internship program was established in 2013 following the Australian Psychology Accreditation Council's (APAC) approval of fifth-year programs in the 2010 [APAC accreditation standards](#). The requirements of the 5+1 internship program were derived by halving the hours of the 4+2 internship program to reflect one year, rather than two years, of supervised practice.
10. In 2012, the 5+1 pathway was included in the [Provisional registration standard](#), and in 2013 the guidelines for the 5+1 internship program were introduced following a wide-ranging public consultation.
11. An update in 2016 to the [General registration standard](#) implemented a small reduction in total internship hours (from 1540 to 1500) and a reduction in required client contact hours (from 560 to 500). Aside from these minor changes, the guidelines have not been updated since their introduction. They are now due for a full review.

General registration competencies

12. In 2023, the Board conducted a [public consultation](#) on updating the competencies for general registration. The new [Professional competencies for psychologists](#) have been approved by the Board and will come into effect on 1 December 2025. The Health Ministers have also approved the updated [Provisional and general registration standards](#) (removing the current competencies from the standards) to come into effect on the same date.
13. As part of the consultation on the competencies, the Board proposed a transition plan to incorporate the updated general registration competencies into other Board documents, such as the [Guidelines for the 5+1 internship](#) and the [Guidelines for the national psychology exam](#). The Board proposed the following plan regarding the internship program:
 - to effectively transition to the updated general registration competencies, a separate consultation would be required to incorporate the updated competencies into the 5+1 internship guidelines (outlined in Table 2, on p.21 of the [Consultation paper](#)), and
 - that all 5+1 interns applying for general registration after the date of effect of the updated competencies will need to meet the updated competencies.
14. Feedback from stakeholders during consultation on updating the general registration competencies overwhelmingly supported both proposals (see the [Consultation report](#)).
15. One purpose of the current consultation is to update the 5+1 guidelines in line with this agreed transition plan to promote a smooth changeover to the updated general registration competencies.

Why the guidelines need updating

Changes to the regulatory context relevant to the internship program

16. Since the guidelines were introduced, the regulatory context for provisional psychologists and psychology supervisors has changed. The Board uses various tools to regulate the psychology profession. Many of these tools have been strengthened, resulting in more effective and efficient regulation:
 - a. New [APAC standards](#) were introduced in 2019, using graduate competencies as the reference point and with a focus on an outcome-based approach (e.g., competency attainment) rather than the previous input-based approach (such as focusing on staffing, program design, curriculum requirements). As the contemporary approach to quality in training is to focus on outcomes, this current review ensures the 5+1 guidelines are up to date and emphasise the competencies for safe practice.
 - b. [Board-approved supervisors](#) (BAS) and the [Supervisor Training Program](#) (STP) were implemented in 2013, ensuring a national standard for psychology supervisors and setting clear requirements for supervisor competencies for psychologists who supervise interns. The BAS program is now well established with a strong focus on effective supervision and the regulatory requirements of the role, with supervisors meeting the Board's [supervisor competencies](#). Because of this, we have confidence in the skills of supervisors and can provide them with more responsibility within the internship year. This will mean less reporting

to the Board and less administrative burden on supervisors and provisional psychologists, along with greater flexibility in the supervisory process.

- c. The [National Psychology Exam](#) (NPE) has been in place since 2014 and is now a well-established regulatory tool. Provisional psychologists undertaking the internship program must pass the NPE in order to apply for general registration as a psychologist. A 2019 quality assurance project concluded the exam is an effective, strong and reliable regulatory instrument that tests the professional competencies for general registration as a psychologist. The NPE will soon be updated to reflect the new [Professional competencies for psychologists](#). The requirements for the internship program should also be updated to ensure provisional psychologists are well prepared during their internship year to undertake the NPE.
 - d. The Board's Education and Training Reform projects involved the retirement of the 4+2 pathway in 2022. The guidelines for the 5+1 internship were based on the 4+2 guidelines, with similar requirements in both. As the number of provisional psychologists completing the 5+1 internship program increases, we believe it is important to update these guidelines in line with current regulatory practices. The proposed update recommends the basic structure of the internship year remain, with the overall requirements becoming less prescriptive for provisional psychologists and their supervisors.
 - e. The updated [Professional competencies for psychologists](#) will take effect on 1 December 2025. Part of the implementation plan for these updated competencies is to incorporate them into other Board documents, including the 5+1 guidelines. All provisional psychologists undertaking the internship year after 1 December 2025 who apply for general registration must meet these updated competencies. It is therefore important to refer to these new competencies in the guidelines.
17. A full review ensures the guidelines and administrative rules capitalise on improvements made to other areas of regulation, such as the NPE, BAS and APAC standards. This allows us to consider the effectiveness of the guidelines as they currently stand alongside this matured suite of regulatory tools, and to update the internship requirements to ensure they are set at an appropriate level that is proportionate to the current risk.

Retirement of the 4+2 internship program

18. The [4+2 internship pathway](#) involves two years full-time supervised training following the successful completion of a four-year sequence of accredited undergraduate study in psychology.
19. In 2019, the [General registration standard](#) and [Provisional registration standard](#) were reviewed and the 4+2 internship was removed as a pathway to general registration. The last intake for the 4+2 internship was in 2022, and it will be [retired on 1 January 2029](#).
20. While the 4+2 internship pathway has produced many high-quality practitioners, it was deemed unsuitable to continue as it carries a high regulatory and administrative burden for all stakeholders and is no longer fit for purpose in the current regulatory context.
21. The 5+1 guidelines, when first written, were based on the 4+2 guidelines by halving the requirements of the 4+2 internship year. While this was an appropriate decision at the time, as the [National Scheme](#) has matured, and the context surrounding the internship program has evolved (see paragraph 16), it is possible to now make different decisions regarding the 5+1 internship requirements and rethink our policy approach.
22. Given the retirement of the 4+2 pathway, and the subsequent increase to 5+1 internship numbers, we feel it is timely to recalibrate the 5+1 internship program requirements.

Ten years of the 5+1 internship program

23. We can now draw on ten years of operation of the 5+1 internship program to inform our approach to updating the guidelines. By reviewing what we've learnt over this time, we can identify any risks we need to respond to and take necessary action to mitigate these so we can continue to adequately protect the public.
 24. By completing five years of study before commencing an internship (compared with four years in the 4+2 pathway), provisional psychologists in the 5+1 pathway have acquired advanced knowledge and skills for
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professional practice and a base of practical experience through their 300 hours of university placements. These factors are likely to increase their suitability to practice psychology, and means some of the current administrative requirements of the 5+1 pathway are not aligned with the regulatory risk associated with the internship program.

- 25. The supervision-to-practice hour ratio, prescribed hours of professional development, submission of six-monthly progress reports, and case reports can all be onerous for both provisional psychologists and supervisors. We are aware from anecdotal feedback that this excess of reporting requirements, and lack of flexibility, can negatively impact the ability of supervisors to provide effective and efficient training.
- 26. Provisional psychologists undertaking the internship year are safe to practice. Notifications data do not suggest there are any risk concerns associated with provisional psychologists undertaking the 5+1 internship year. In addition, this data has shown us that there is no evidence that those who complete the internship program attract notifications at a disproportionate rate in the two years following general registration.

Proposed changes

- 27. The current 5+1 guidelines are available on the [Board's website](#). The proposed *Draft guidelines for the 5+1 internship program* (draft 5+1 guidelines) are at [Attachment A](#).

Updating the guidelines to align with the contemporary regulatory context

- 28. The Board proposes to reduce the regulatory burden and complexity of the internship program by reducing the reporting requirements. By removing parts of the guidelines that are not related to the core requirements of the 5+1 internship, while including robust minimum standards, we continue to ensure public safety. Relying on the regulatory mechanisms of APAC accreditation, the NPE, BAS and STP programs as well as the updated competencies (see paragraph 16) we can be assured that the guidelines will protect the public in an effective and efficient way.
- 29. The below table shows the current 5+1 internship requirements compared with the proposed 5+1 internship requirements.

Table 1: Summary of proposed changes to 5+1 requirements

Current requirements	Proposed requirements
Hours	
1,500 total internship hours	NO CHANGE: 1,500 total internship hours
1,360 hours supervised practice <i>In a Board-approved role as per the internship plan.</i>	CHANGE: 1,360 hours removed from the guidelines
500 hours of client contact <i>60 of these hours may be skills acquisition activities, including simulated learning.</i>	NO CHANGE

<p>80 hours supervision from a Board-approved supervisor</p> <p><i>Minimum 50 hours must be individual supervision with the principal supervisor.</i></p> <p><i>70 hours must be direct (real-time communication between intern and supervisor).</i></p> <p><i>No more than 20 hours through non-visual communication e.g., telephone.</i></p> <p><i>Up to 10 hours may be indirect (asynchronous) supervision such as written feedback.</i></p> <p><i>One hour of supervision per 17 hours of psychological practice.</i></p>	<p>CHANGE: 80 hours supervision from a Board-approved supervisor</p> <p><i>Minimum 50 hours must be individual supervision with the principal supervisor.</i></p> <p><i>The supervisor and provisional psychologist are to determine the most effective methods to complete the required supervision.</i></p> <p><i>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.</i></p> <p><i>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</i></p>
<p>60 hours of professional development</p>	<p>CHANGE: Professional development changed to education and training activities</p> <p>CHANGE: Hours not prescribed by the Board</p> <p><i>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.</i></p> <p><i>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.</i></p>
<p>Direct Observation</p> <p><i>Eight sessions are directly observed by the supervisor during the internship year. Four sessions must be psychological assessments and four must be intervention sessions.</i></p>	<p>NO CHANGE</p>
<p>Reporting</p>	
<p>Logbooks</p> <p><i>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.</i></p>	<p>CHANGE: Logbook submission requirements</p> <p><i>Logbooks are required to only be submitted to the supervisor(s) however the Board can request submission of the logbook at any time.</i></p> <p><i>A logbook is to be kept until general registration is approved.</i></p>
<p>Six-month progress reports</p> <p><i>Principal supervisor: evaluation of progress</i></p>	<p>CHANGE: Progress reviews</p> <p><i>Progress reviews should be undertaken with the principal supervisor during the internship. The frequency and format of these reviews is</i></p>

<p><i>Provisional psychologist: critical self-reflection on progress.</i></p> <p><i>Submitted within 28 days of the end of each six-month period.</i></p>	<p><i>determined by the principal supervisor. The Board can request submission of progress reviews at any time.</i></p>
<p>Case reports</p> <p><i>One assessment and one intervention case study from a pool of four developed during the internship.</i></p> <p><i>Submitted to the Board at any time during the internship, after a review by the principal supervisor.</i></p> <p><i>It is recommended one is submitted within the first 770 hours, and one in the second 770 hours of the internship.</i></p>	<p>CHANGE: Case reports not required</p> <p><i>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.</i></p>
<p>Final assessment of competence</p> <p><i>Principal supervisor: Evaluation of competence.</i> <i>Provisional psychologist: Critical evaluation.</i></p> <p><i>To be submitted at the end of the internship, after the National Psychology Exam has been passed.</i></p>	<p>NO CHANGE</p>
Administrative requirements	
<p>Approval of work role and internship plan by the Board</p> <p><i>Internship plan to be completed by the provisional psychologist and supervisor(s) and submitted to Ahpra.</i></p>	<p>NO CHANGE</p>
<p>Minimum time to complete: 44 weeks</p>	<p>NO CHANGE</p>
<p>Maximum time to complete: 5 years</p>	<p>NO CHANGE</p>

30. We propose that the completion, submission and review of case reports no longer be required, and six-monthly progress reports be replaced with a progress review between the supervisor and provisional psychologist for the following reasons:
- a. From a regulatory standpoint, it is rare for these progress reports to raise concerns about a provisional psychologist's practice. Since provisional psychologists completing the 5+1 internship have relatively little regulatory risk associated with their practice (given they can only practice under supervision), it is inefficient to require regular reports be submitted to the Board.
 - b. Since the 5+1 internship began, APAC standards have significantly changed. These changes saw Level 3 (fifth year of study) competencies updated to include psychological practice capabilities such as conducting assessments, making diagnoses, and providing interventions, as well as written communication skills in the form of psychological reports. These competencies have already been assessed prior to the start of the internship, both through coursework and completing 300 hours of placements, providing a foundational level of communication skills and professional practice experience. This reduces the need for provisional psychologists to prepare and submit case reports for assessment within the internship year.

- c. While case reports are a good learning tool, we are proposing to remove them as a regulatory requirement for the 5+1 internship. Removing the case report requirement does not mean we are removing the only opportunity for further experience and skill development in this area. Written communication and assessment skills will continue to be developed throughout the internship through everyday work role tasks (e.g., case notes, court reports, handovers).
 - d. We propose the provisional psychologist undertake a progress review/s with the principal supervisor during their internship. The supervisor will determine the frequency based on individual need, as well as the format of these reviews. The Board will provide a review template should the supervisor wish to utilise this, however they will not need to be submitted to Ahpra unless requested. We believe this will assist in removing unnecessary regulatory burden, and add greater flexibility to the supervisory process, while putting in place a checkpoint to ensure the provisional psychologist is progressing as expected.
31. Logbooks have significant value in terms of managing the internship and will still need to be completed and reviewed by supervisors, but they will not need to be submitted to Ahpra unless requested.
32. While the number of supervision hours has not changed, the methods to deliver supervision, and hours specified for each method, are no longer prescribed by the Board. These will instead be determined by the supervisor(s) and provisional psychologist. The current guidelines recommend supervision occur on a weekly basis, and we have retained that recommendation in the draft guidelines. We are confident in the expertise of supervisors from the nationally consistent supervisor training program. These changes recognise the skills and knowledge of supervisors and promote their responsibility for internship training. In addition, these changes allow for adaptability within the internship year, including to developments in technology (e.g., videoconferencing for remote learning and supervision).
33. Culturally informed supervision for Aboriginal and/or Torres Strait Islander provisional psychologists has always counted towards total supervision hours. However, this is not explicitly stated in the current guidelines. By adding a *Cultural supervision* section, we are making clear that engaging in this learning is counted towards supervised practice, and that the Board encourages this type of supervision.
34. We propose removing the term *professional development (PD)* from the guidelines, and replacing this with *education and training activities*, and that the Board no longer prescribes these minimum hours. This is because:
- a. the name change addresses the confusion around using the term professional development in the context of the internship year and better reflects that the provisional psychologist is still developing competence. Often, *continuing professional development* and *professional development* are used interchangeably, and it is thought that provisional psychologists must therefore meet PD standards just as generally registered psychologists do. Provisional psychologists have never been included under the Board's [Continuing professional development registration standard](#) as this standard is for maintaining knowledge and skill *once general registration is achieved*
 - b. no longer prescribing minimum education and training activity hours reflects contemporary views on measuring quality in training, in particular in relation to assessing outcomes rather than accounting for inputs (e.g., demonstrating competence, rather than meeting hours)
 - c. including reference to the updated [Professional competencies for psychologists](#), in particular the competencies around demonstrating a health equity and human rights approach when working with Aboriginal and Torres Strait Islander peoples and diverse groups, ensures the guidelines prioritise cultural safety and diversity.
35. The 1,360 hours listed in the current guidelines are the total internship hours (1,500) after the 60 hours of professional development (PD) and 80 hours of supervision have been accounted for. As we are proposing to no longer prescribe education and training hours, we can no longer prescribe the remaining 'supervised practice hours' at 1,360, as there will be variation in the number of education and training hours completed. In addition, we have received feedback from provisional psychologists that including the 1,360 hours is confusing as they are not often clear what these hours must entail.
- a. Removing these hours from the guidelines does not change the total number of internship hours required (1,500), the number of client contact hours (500), or the number of supervision hours (80).

Aligning 5+1 guidelines with the updated general registration competencies

36. The Board proposes to replace the references to the current competencies for general registration with the updated competencies as outlined in the [Professional competencies for psychologists](#).
37. This includes updating the terminology used in the guidelines and the definitions section to be in line with language used in the professional competencies (for example, replacing the term ‘core competency’ with ‘professional competency’).
38. Aligning the guidelines with the updated professional competencies will ensure that the internship program includes the contemporary competencies required for general registration, and promotes safe and effective psychological practice. This is consistent with the agreed transition plan for a smooth changeover to the updated general registration competencies (see paragraphs 48 to 50 for details on the transition plan).

Refreshing the document

39. The Board proposes to refresh and streamline the 5+1 guidelines to:
 - a. remove content from the guidelines that is obsolete or is historical information that is no longer needed, for example updating references to the professional competencies (including removing the list of old competencies by replacing this with links to the new document) and updating hyperlinks to required forms and related documents,
 - b. conduct a plain English review,
 - c. streamline the structure of the document, and
 - d. update the document to the Board’s current logo and fonts.
40. Some sections of the current guidelines have been removed in the draft 5+1 guidelines, as we feel this information is better placed in another format, such as supporting materials published to the Board’s [website](#). This will help to streamline the guidelines, and supporting documents can be updated easily when required.
41. The below information at Table 2 highlights the parts of the guidelines that have been removed and the proposed new formats for this information.

Table 2: Removed guidelines sections (and proposed supporting materials)

Removed from current guidelines	Proposed supporting material
4.2.1 Establishing supervisory arrangements	Fact sheet – How to set up a good supervisory relationship Fact sheet – How to participate in supervision
7.11 Dispute resolution	Fact sheet – How to resolve supervisory disputes Fact sheet – Mandatory notifications during the internship
Appendix C Unsatisfactory supervision	Fact sheet – How to resolve supervisory disputes

Options

Option 1: Maintain status quo

42. Option 1 would continue the current *Guidelines for the 5+1 internship program*, last updated in 2013, with no changes.
43. In keeping with good regulatory practice, the current guidelines are due for review. Maintaining the current guidelines would mean opportunities for improvement would be missed, including revising requirements to be in line with updated regulatory tools, and removing unnecessary regulatory and administrative burden. The 5+1 internship program would become progressively less contemporary and relevant, and would not efficiently and effectively train provisional psychologists for general registration.

Option 2: Update the guidelines for the 5+1 internship program

44. Option 2 proposes revised *Draft guidelines for the 5+1 internship program* at Attachment A. Option 2 proposes to:
 - a. update the guidelines to better align the internship program requirements with the contemporary regulatory context,
 - b. reduce the regulatory burden and complexity of the internship,
 - c. ensure the guidelines reference the recently updated professional competencies for psychologists, and
 - d. generally update the language and structure of the guidelines to improve readability.

Preferred option

45. The Board's preferred option is Option 2.

Estimated impacts of the proposed changes

Potential benefits of the preferred option

46. We anticipate that the proposed guidelines would have the following benefits:
 - a. A reduction to the administrative and reporting complexity of the internship requirements resulting in less administrative burden on provisional psychologists, supervisors, and Ahpra.
 - b. An increase in the flexibility for supervisors and provisional psychologists within their +1 internship year to determine appropriate training tasks and timing of internship requirements, without changing the minimum standards that ensure public safety.
 - c. Improved alignment of the internship program with improvements made to other regulatory tools (such as the NPE, BAS and STP) and better align regulatory requirements with regulatory risk.
 - d. Ensuring the internship program assesses the contemporary competencies required for general registration, provide all stakeholders with clear guidance about the Board's expectations of the threshold professional competencies necessary for a registered psychologist in Australia, and promote safe and effective psychological practice now and into the future.
 - e. Promoting a smooth changeover to the updated general registration competencies that is consistent with the transition plan supported by stakeholders during the consultation on updating the competencies.
 - f. Providing an improved, simplified and easier to read guideline document for stakeholders.

Potential impacts of the preferred option

Becoming familiar with the changes

47. Provisional psychologists, supervisors and educators would need to become familiar with the revised guidelines if they were approved by the Board. Implementing these guidelines would result in changes to internship requirements, including reporting requirements, and place more responsibility on the provisional psychologist and principal supervisor to determine the methods of supervision.

Supporting transition for stakeholders

48. To support a smooth implementation of the updated guidelines for the 5+1 internship program (if approved), the Board would publish the guidelines when approved and have a future date for the guidelines to come into effect on 1 December 2025. This will allow a transition period for provisional psychologists, supervisors, internship providers and others to become familiar with the changes, particularly the change to the reporting requirements. As there is no change to the minimum requirements (e.g., internship hours remain the same), and the reporting and administrative requirements are reduced, we anticipate an easy transition to the updated guidelines for all stakeholders.
49. A set of Frequently Asked Questions (FAQs) regarding the updates to the guidelines will be published alongside the advanced copy (if approved). This will include information for provisional psychologists (and their supervisors) who may be completing their internship on 1 December 2025 when the new guidelines come into effect.
50. An advance copy of the [Professional competencies for psychologists](#) has already been published. We encourage provisional psychologists and their supervisors to become familiar with and self-assess against the updated competencies in anticipation of them coming into effect. We have developed and published resources including [fact sheets](#), [FAQs](#), and [a self-assessment tool](#) to support this change.

Potential unintended consequences of the preferred option

51. The Board will undertake wide-ranging public consultation with supervisors, provisional psychologists, higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, and consumers to gather feedback about the proposed changes.
52. Any unintended impacts of the proposed updated guidelines raised during consultation will be considered, and actions will be taken to mitigate any potential consequences for stakeholders including provisional psychologists, supervisors, healthcare users, and other priority groups in the community.
53. Any unintended impacts of the proposed updated guidelines raised during consultation will be considered and actions taken to mitigate any potential consequences for Aboriginal and Torres Strait Islander Peoples, the provision of culturally safe care and the elimination of racism
54. The Patient and Consumer Health and Safety Impact Statement at Appendix A has more information about the Board's assessment of the potential effects of the proposed updated guidelines.
55. The Board's statement of assessment against Ahpra's procedures for the development of registration standards, codes and guidelines (Appendix B) provides more information about the Board's view that the preferred option to update the guidelines is the best option for protection of the public, and balancing streamlining of regulatory requirements without substantially changing the minimum standards that ensure public safety.

Questions for consideration

56. We are seeking your feedback on the development of the *Draft guidelines for the 5+1 internship* (draft 5+1 guidelines).

Specific questions the Board would like you to address are below.

Preferred option
1. Do you support the Board's preferred option (option 2) to update the 5+1 guidelines ? Please provide reasons for your view.
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.
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.
Content of the draft 5+1 guidelines
4. Is there any content that needs to be changed, deleted, or added into the draft 5+1 guidelines ?
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?
Proposed implementation of the draft 5+1 guidelines
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 psychologistssupervisors and internship providers to prepare. Are you in support of this transition and implementation plan?
Potential impacts and benefits
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.
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 for more detail).
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 for more detail).
Other
10. Do you have any other feedback or comments about the draft 5+1 guidelines ?

Next steps

57. The Board will consider the feedback from this preliminary consultation and consider the need for any revisions before deciding on the next step being public consultation.

Relevant sections of the National Law

58. Psychologists in Australia practise in a regulatory framework established by the [Health Practitioner Regulation National Law](#) (the National Law). The Board has powers under the National Law to develop standards, codes and guidelines about the eligibility of individuals for registration in the psychology profession.
59. Relevant sections of the National Law for this review include Section 3 (Objectives and guiding principles), Sections 38 to 40 (Registration standards, codes and guidelines) and Sections 52 to 54 (General registration).

Appendices (within this document)

A: National Boards patient and consumer health and safety impact statement

B: Statement of assessment against Ahpra's *Procedures for the development of registration standards, codes and guidelines*

Attachments (separate attachments)

A: *Draft guidelines for the 5+1 internship program*

Appendix A: National Boards Patient and Consumer Health and Safety Impact Statement

Proposed draft guidelines for the 5+1 internship program

Statement purpose

The National Boards Patient and Consumer Health and Safety Impact Statement (Statement)¹ explains the potential impacts of a proposed registration standard, code or guideline on the health and safety of the public, particularly those vulnerable to harm in the community which includes those subject to stigma or discrimination in health care, and/or experiencing health disadvantage and Aboriginal and Torres Strait Islander Peoples.

The four key components considered in the Statement are:

1. The potential impact of the proposed revisions to the registration standard, code or guideline on the health and safety of patients and consumers particularly those vulnerable to harm in the community including approaches to mitigate any potential negative or unintended effects.
2. The potential impact of the proposed revisions to the registration standard, code or guideline on the health and safety of Aboriginal and Torres Strait Islander Peoples including approaches to mitigate any potential negative or unintended effects.
3. Engagement with patients and consumers particularly those vulnerable to harm in the community about the proposal.
4. Engagement with Aboriginal and Torres Strait Islander Peoples about the proposal.

The National Boards Patient and Consumer Health and Safety Impact Statement aligns with the [National Scheme's Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025](#), [National Scheme engagement strategy 2020-2025](#), [the National Scheme Strategy 2020-25](#) and reflects key aspects of Ahpra's [Procedures for the development of registration standards, codes, guidelines and accreditation standards](#).

Below is our assessment of the potential impact of the proposal to update the [Guidelines for the 5+1 internship](#) on the health and safety of patients and consumers, particularly those vulnerable to harm in the community, and Aboriginal and Torres Strait Islander Peoples.

1. How will this proposal impact on patient and consumer health and safety, particularly those vulnerable to harm in the community? Will the impact be different for people vulnerable to harm in the community compared to the general public?

The Psychology Board of Australia (the Board) has carefully considered the impacts the proposed *Draft guidelines for the 5+1 internship* could have on patient and consumer health and safety, particularly those vulnerable to harm in the community, in order to put forward what we think is the best option for consultation. The proposed option is based on best practice approaches.

¹ This statement has been developed by Ahpra and the National Boards in accordance with section 25(c) and 35(c) of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law). Section 25(c) requires Ahpra to establish procedures for ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice. Section 35(c) assigns the National Boards functions to develop or approve standards, codes and guidelines for the health profession including the development of registration standards for approval by the Ministerial Council and that provide guidance to health practitioners registered in the profession. Section 40 of the National Law requires National Boards to ensure that there is wide-ranging consultation during the development of a registration standard, code or guideline.

A primary goal is to remove from the guidelines anything that is not related to the core requirements of the 5+1 internship program. We believe this will better align the requirements with contemporary regulation of provisional psychologists, ensuring they meet the professional competencies for general registration and are trained to safely practice psychology, in turn having a positive impact on patient and consumer health and safety.

Our engagement through consultation will help us to better understand possible outcomes and meet our responsibilities to protect patient safety and healthcare quality.

2. How will National Boards engage with patients and consumers, particularly those vulnerable to harm in the community during consultation?

In line with our consultation processes, the Board is undertaking wide-ranging consultation. We will engage with patient and consumer bodies, the Consumer Advisory Council, Aboriginal and Torres Strait Islander Peoples, peak bodies and other relevant organisations to get input and views from people vulnerable to harm in the community.

3. What might be the unintended impacts for patients and consumers, particularly people vulnerable to harm in the community? How will these be addressed?

As the consultation paper explains, the Board has carefully considered what the unintended impacts of the proposed *Draft guidelines for the 5+1 internship* might be. Consulting with relevant organisations and those vulnerable to harm in the community will help us to identify any other potential impacts. We will fully consider and take actions to address any potential negative impacts for patients and consumers that may be raised during consultation particularly for people vulnerable to harm in the community.

4. How will this proposal impact on Aboriginal and Torres Strait Islander Peoples? How will the impact be different for Aboriginal and Torres Strait Islander Peoples compared to non-Aboriginal and Torres Strait Islander Peoples?

The Board has carefully considered any potential impact of the proposed *Draft guidelines for the 5+1 internship* on Aboriginal and Torres Strait Islander Peoples and how the impact compared to non-Aboriginal and Torres Strait Islander Peoples might be different in order to put forward the proposed option for feedback as outlined in the consultation paper.

The draft 5+1 guidelines align with the recently published [Professional competencies for psychologists](#) that set the competencies for safe and effective practice as a psychologist in Australia, as provisional psychologists undertaking the internship year are expected to meet the competency requirements for general registration. As outlined in the professional competencies, a key aspect of safe and effective health care is to practice cultural safety. The improvements to the professional competencies are expected to positively impact Aboriginal and Torres Strait Islander Peoples, families, and communities, along with clients from other priority community groups.

Our engagement through consultation will help us to identify any other potential impacts and meet our responsibilities to protect safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

5. How will consultation about this proposal engage with Aboriginal and Torres Strait Islander Peoples?

The Board is committed to the National Scheme's [Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025](#) which focuses on achieving patient safety for Aboriginal and Torres Strait Islander Peoples as the norm, and the inextricably linked elements of clinical and cultural safety.

As part of our consultation process, we have tried to find the best way to meaningfully engage with Aboriginal and Torres Strait Islander Peoples. We are continuing to engage with Aboriginal and Torres Strait Islander organisations and stakeholders, including Ahpra's Aboriginal and Torres Strait Islander Health Strategy Group for Psychology.

6. What might be the unintended impacts for Aboriginal and Torres Strait Islander Peoples? How will these be addressed?

The Board has carefully considered what might be any unintended impacts for the *Draft guidelines for the 5+1 internship*. Continuing to engage with relevant organisations and Aboriginal and Torres Strait Islander Peoples will help us to identify any other potential impacts. We will consider and take actions to address

any other potential negative impacts for Aboriginal and Torres Strait Islander Peoples that may be raised during consultation.

7. How will the impact of this proposal be actively monitored and evaluated?

Part of the Board's work in keeping the public safe is ensuring that all Psychology Board standards, codes and guidelines are regularly reviewed.

In developing *Draft guidelines for the 5+1 internship* and in keeping with this, the Board will regularly review the guidelines to check they are working as intended.

Appendix B: Statement of assessment against Ahpra's *Procedures for the development of registration standards, codes and guidelines*

Proposed draft guidelines for the 5+1 internship program

Introduction

Section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires Australian Health Practitioner Regulation Agency (Ahpra) to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice.

Ahpra's *Procedures for the development of registration standards, codes and guidelines* (2023) is available at on the [Ahpra Resources webpage](#).

Context – issue or problem statement

It is good regulatory practice to review registration standards, codes, and guidelines on a planned, regular basis to test their workability, clarity, and continued relevance. This consultation is considering proposed revisions to the guidelines for the 5+1 internship that have been in effect since 2013 and are therefore due for review. Proposed updates to the Guidelines aim to bring them in line with changes in the regulatory context, and to ensure they are aligned with contemporary psychology practice.

Assessment

Below is the Psychology Board of Australia's (the Board) assessment of the proposal to update the [Guidelines for the 5+1 internship](#) taking account of the Ahpra procedures.

1. Describe how the proposal

- 1.1 takes into account the paramount principle, objectives and guiding principles in the National Law²
- 1.2 draws on available evidence, including regulatory approaches by health practitioner regulators in countries with comparable health systems

The Board considers that the proposed update to the *Draft guidelines for the 5+1 internship* (the guidelines) meets the objectives and guiding principles of the National Law.

The proposal considers the National Scheme's paramount principle of protecting the public and maintaining public confidence in the safety of services provided by health practitioners, by setting out the core requirements for the 5+1 internship to ensure safe and effective psychological practice. The proposed changes aim to balance streamlining regulatory requirements without changing minimum standards that ensure public safety. Since the guidelines were introduced, the Board has improved its regulatory infrastructure including the introduction of the National Psychology Exam and Board-approved supervisor training, as well as updates to Australian Psychology Accreditation Council (APAC) standards. This means that regulation of provisional psychologists in the 5+1 internship year is more effective. This ensures they are competent to practice safely and effectively, and provides a basis to reduce regulatory burden during the internship.

² See section 3 and section 3A of the National Law

The proposed guidelines also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way. The proposed changes align the guidelines with other improved policies and guidelines published by the Board (see paragraph 16), promoting consistency in regulatory approaches. Consistency in regulation for the psychology profession can facilitate consumer, client, and practitioner understanding and contribute to the safety and quality of healthcare.

2. Outline steps that been taken to:

- achieve greater consistency within the National Scheme (for example, by adopting any available template, guidance or good practice approaches used by National Scheme bodies)
- meet the wide-ranging consultation requirements of the National Law

The Board has been informed by changes in the National Law to recognise cultural safety as an objective and guiding principle when proposing the include updated cultural competencies into the 5+1 guidelines.

The National Law requires wide-ranging consultation on the proposed standards, codes and guidelines. The Board held preliminary consultation for six weeks between 28 January and 11 March. This feedback has been incorporated into the proposal that is now released for public consultation.

The Board will now ensure that there is the opportunity for broader public comment via an eight-week public consultation. This includes publishing a consultation paper on the Board's website and informing health practitioners and the community of the review via the Board's electronic newsletter and a social media campaign.

The Board will consider the feedback it receives when finalising the 5+1 guidelines.

3. Address the following principles:

- a. whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

The purpose of the 5+1 guidelines is to:

- outline the requirements of the 5+1 internship program, including describing the aims, entry requirements and completion pathway for the internship, and
- guide provisional psychologists and their supervisors through the 5+1 internship program by detailing the standards and responsibilities of the supervisory arrangement.

The Board's consultation paper includes two options.

Option 1 proposes to continue with the current 5+1 guidelines (status quo). Keeping the status quo does not enable the Board to ensure provisional psychologists are effectively trained for general registration.

Option 2 is to make a range of changes to support good regulatory practice, including incorporating the updated *Professional competencies for psychologists*, and reducing the administrative and regulatory burden of the current requirements.

Option 2 is considered by the Board as being the best option for achieving the stated purposes of providing guidance that is fit for purpose and contemporary. This option is expected to:

- better align the internship program requirements with the contemporary regulatory context,
- reduce the regulatory burden and complexity of the internship program,
- ensure the guidelines are aligned with contemporary psychology practice by including the recently updated Professional competencies for psychologists into the internship program, and
- generally update the language and structure of the guidelines to improve readability.

- b. whether the proposal results in an unnecessary restriction of competition among health practitioners

The proposal is not expected to restrict competition. A revised guideline would continue to apply to all provisional psychologists who are completing the 5+1 internship pathway to general registration. The proposed changes will likely reduce the regulatory burden and administrative requirements of the internship year by removing unnecessary requirements or barriers for entry and completion, and providing an increase in flexibility to meet the internship requirements.

c. whether the proposal results in an unnecessary restriction of consumer choice

The proposal is not expected to restrict consumer choice. Psychologists are currently required to demonstrate contemporary competencies for safe and effective psychological practice.

By updating and streamlining the requirements of the internship program, the number of provisional psychologists completing the 5+1 internship and who will meet eligibility for general registration may ultimately improve consumer's access and choice to psychological services.

d. whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

The Board has considered the potential costs associated with the proposal during the development of this consultation paper, and concluded that the likely costs are minimal:

- There are no costs to the general public as a result of the proposed changes.
- The costs for the provisional psychologists undertaking the 5+1 internship remain the same as they are currently.
- There may even be reduced costs for supervisors, provisional psychologists and Ahpra due to the reduced administrative burden.

If approved, the *Draft guidelines for the 5+1 internship* would provide provisional psychologists completing the internship year clear and specific minimum standards. This benefit outweighs any minimal costs related to provisional psychologists, supervisors and other stakeholders needing to become familiar with updated guidelines.

e. whether the proposal's requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants, and

The Board is committed to a plain English approach that will help psychologists and the public understand and apply the requirements of the guidelines.

The Board has avoided using profession-specific jargon, where possible, in the proposed *Draft guidelines for the 5+1 internship*. This is to promote ease of understanding.

f. whether the Board has procedures in place to ensure that the proposed standard remains relevant and effective over time.

The Board has procedures in place to support a review of the *Draft guidelines for the 5+1 internship* at least every five years as it is good regulatory practice to do so. The review of the current guidelines was delayed as the Board was waiting for the retirement of the 4+2 internship to take effect and the professional competencies for psychologists to be updated. In doing so, all changes to the guidelines for the 5+1 internship could be made in line with these updates and in one review.

The Board may choose to review approved guidelines earlier, in response to any issues which arise or new evidence which emerges, to ensure their continued relevance and workability.

4. Closing statement

Feedback on any regulatory impacts identified during the consultation process and/or in developing the revised guideline will be provided to the Psychology Board of Australia to inform decision-making.

The Board has completed a patient health and safety impact statement for consultation and will provide a patient and safety impact assessment (if the proposal is approved).