

From: [REDACTED]
To: [Standard Consultation](#)
Subject: Response from NSW Nursing and Midwifery Office
Date: Tuesday, 24 December 2013 11:08:20 AM

Dear Sir/Madam

Thank you for the opportunity to comment on the Criminal History and English Language Skills Standards Consultation.

Criminal History Standard:

The NSW Nursing and Midwifery Office (Ministry of Health) supports Option One in the consultation paper, to maintain the status quo.

English Language Skills Standards:

The NSW Nursing and Midwifery Office (NaMO) supports Option Two in the consultation paper, to revise the Standard, and makes the following responses to your questions:

1. *From your perspective, how is the current registration standard working?*
Generally, the current standard works well. The Local Health Districts report that a small number of nurses and midwives do struggle with communication in English in the work setting, despite meeting the standard for registration, either by completing the English language test or having the required number of years of education in English.
2. *Should the countries recognised in the standard be consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing? If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?*

NaMO does not support the suggestion of expanding the list of recognised countries and recommends that South Africa be removed from the "recognised countries" list. A number of languages are spoken in South Africa and it can no longer be assumed that English is the first language of a majority of applicants seeking health professional registration in Australia. It is not thought to be necessary to align AHPRA's list of recognised countries with that of the Department of Immigration and Citizenship as the purpose of the lists for the two organisations is not necessarily the same.

3. *Should National Boards accept results from more than one sitting or is there a better way to address this issue, such as the approaches described above?*
4. *Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?*

It is recommended that the standard of a score of 7 (IELTS) or B (OET) for each component of the test be maintained and that, based on the limited evidence available, that the varying arrangements for multiple sittings (depending on the test undertaken) remain the same. This should not be changed unless further evidence to the contrary becomes available. With regard to results that are "close" to the required amount, it is recommended that a minimum score of 7 or B is required and "close enough" is not acceptable.

Given the document states that there is little evidence of change in English language competency across the 3 to 4 years of a tertiary course, it is suggested that the minimum score required by Universities for entry into a course leading to registration with AHPRA should match that of the Registration Standard, that is, a score of 7 or B.

5. *Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?*
6. *Is there any content that needs to be changed or deleted in the revised draft registration standard?*
7. *Is there anything missing that needs to be added to the revised draft registration standard?*

The Standard should clarify why there is an alternative document for Nursing and Midwifery. It is assumed that this is due to the vocational nature of some nursing courses, but this should be explicit in the document.

Kind regards

Anne

Anne Robertson

Associate Director | **The Nursing and Midwifery Office**
Level 8, 73 Miller Street, North Sydney 2060