

## Submission in response to public consultation on English language skills registration standards

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### Preamble

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As a member of staff at Monash University, I work closely with international and local students from non-English speaking backgrounds undertaking various health professional courses, in particular, nursing and midwifery. I am committed to contributing to the development of graduates who are safe to practise and able to deliver high quality patient care in partnership with the multidisciplinary team. To achieve these goals, graduates need to demonstrate effective communication skills. Therefore, I support a review of the current English language standards and submit a response to the questions posed in the consultation paper with particular reference to the registration of nurses and midwives.

### Question 1

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The current standard seems to be working well in terms of assuring public safety. However, it may not be working as well from the perspective of some applicants from non-English speaking backgrounds (NESB) who have undertaken their degrees in Australia.

Currently, NESB nursing/midwifery graduates, whether Australian citizens, permanent residents or full fee-paying international students, are required to attain a certain score in a language proficiency test in order to be able to register, only if they have studied less than five years in Australia or any other of the listed countries. This situation seems unfair to those graduates who were assessed as having suitable language skills for studying their chosen university course even if they had not completed two years of high school or vocational study in Australia, which would make up the five years required as a minimum for exemption. It is important to consider, however, that these students would not have been able to satisfactorily complete their degrees had they not demonstrated adequate language skills for safe practice during their clinical placements and university-based work. Therefore, it is contradictory, and puzzling for these candidates, that upon successful completion of a Board-approved and accredited nursing/ midwifery degree, delivered in Australia by Australian institutions, their English language ability is questioned. Furthermore, some graduates have expressed concerns about the legality of this additional requirement for those holding a pre-registration Australian qualification.

It is my opinion that graduate nurses/midwives who have completed their pre-registration course in Australia should be deemed competent communicators and be exempted from the additional requirement of demonstrating English language proficiency by means of a language test.

### *Question 2*

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For those candidates who seek registration in order to apply for various skilled work visas, it would seem sensible if the Board and the Department of Immigration and Border Protection (DIBP) had the same requirements. However, it should be noted that not all applicants fall into this category as some are already permanent residents or Australian citizens. Therefore, the Nursing and Midwifery Board of Australia should not modify their requirements just to match those of the DIBP but work jointly with the Department to reach a consensus and support each other's decision with best available evidence.

Regarding whether exemptions for South Africans should be phased out or maintained, the matter to consider should centre on whether the applicants themselves have been native English speakers or not, rather than on the country they come from.

### *Question 3*

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I am not aware of evidence that would entitle candidates from other countries to be included in the exemption list. However, applicants from countries where Australian institutions deliver Board-approved nursing/midwifery courses and who have successfully completed such courses, should be considered for exemption or given special consideration.

### *Question 4*

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The approach suggested in Point 4 of the revised draft seems adequate.

### *Question 5*

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Accepting results from more than one sitting in a 12 month period, as suggested in point 4 of the revised draft, seems to be a reasonable approach.

At the recent OET Forum held in Melbourne on October 29, 2013, Dr Carsten Roever, a senior lecturer with the Language Testing Research Centre (LTRC) of The University of Melbourne, categorically stated that there is no research basis for requiring a score for all skills to be achieved at the same sitting. Dr Roever updated the audience on current research on language attrition, highlighting that a candidate performing at a high level, such as an IELTS 7/OET B

and above, would take approximately four years for their skills in any language area to noticeably decline. Dr Roever further explained that language skills take time to develop and therefore, cannot be crammed before an exam. From this perspective, a candidate who can perform at a required level at some point in time, should be expected to maintain that same level of language ability for 12 months and further beyond. This suggests that accepting results from more several sittings over a period of up to four years, should not be a concern for high level candidates.

## **Questions 6 - 9**

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Below I have addressed these four questions in an integrated way by offering comments on the Revised Standards Draft and suggesting deletions and inclusions specifically relevant to the registration of nurses and midwives. Only relevant portions of the draft have been included and highlighted, with comments included below each portion.

### **Registration standard: English language skills**

#### **1st paragraph**

The <xx> Board of Australia (Board) requires all applicants for initial registration to demonstrate English language skills to be suitable for registration.

This registration standard sets out how an applicant for registration can demonstrate to the Board that **their competency in speaking and communicating in English is sufficient to practice the <xx> profession.**

#### **Comment**

It is suggested to delete the words “speaking and” to put the focus on the candidate’s communicative ability rather than one specific language skill.

#### **Test results**

- Test results will be accepted if they were obtained:
  - within [two (*current position*) ] or **[three (*alternative for consultation*)]** years prior to applying for registration; **or**

#### **Comment**

The three-year option is recommended based on my response to Question 5.

#### **What must I do? Point 4**

4. Completion of one of the following tests of English language proficiency at the specified standard:
  - a) the IELTS examination (academic module) with a minimum score of seven in each of the four components (listening, reading, writing and speaking). Results from (*Options for consultation*) [one] or **[up to three]** test sittings in a 12 month period may be used, only if all scores are 6.0 or above.

#### **Comment**

Out of the options provided, I would choose “up to three” sittings. However, based on my response to Question 5, I would suggest that “no limit to the number of sittings” would seem a more evidence-based option, as contemplated in Point 4, sub-point b) for

OET results. Furthermore, the fact that no number of sittings is specified for OET results would encourage registrants to choose the OET test over IELTS. This may raise other issues for the Board as well as imply higher costs for the applicants.

**What must I do? Appendix A – Alternative [to Point 1] for nursing and midwifery**

**Comment**

In agreement with my answer to Question 1, I have some concerns here about the five-years required for exemption and how this condition may affect those NESB applicants graduating from Australian institutions who are unable to meet this requirement. I am referring to candidates who have earned a Bachelor of Nursing or Midwifery degree because they have met the requirements of their course and who are entitled to their qualification regardless of their past study history and achievements (ie regardless of whether they had completed secondary school or a two-year TAFE qualification prior to starting university).

I would like to suggest that the Board should take an approach similar to that of universities. If a graduate nurse/midwife has been able to develop the language skills to complete a Board-approved degree in nursing and/or midwifery in Australia, the Board should consider granting registration to this person without any further testing. It should not matter whether the applicant's English language skills were developed over a period of five years of study or less, or whether they were developed in a study setting or a different setting, such as a workplace. The NESB person who has achieved the same Board-approved qualification as a native English-speaking peer at an Australian institution should be entitled to the same right to registration.

Furthermore, as the draft stands, the requirement that the five years include a minimum of two in a pre-registration course approved by the regulatory body may prove problematic for some. It precludes NESB graduates from Monash's Master of Nursing Practice (MNP) program or similar programs taught by other Australian institutions from qualifying for exemption. The MNP is a Board-approved graduate entry pre-registration course of less than 2 years duration (full-time equivalent).

Based on these points, it is suggested that the text be modified as follows:

**ALTERNATIVE FOR NURSING AND MIDWIFERY**

1. Applicants for registration

**Registered nurses and registered midwives**

- a). An applicant for registration as a registered nurse and/or a registered midwife who has provided evidence of completion of a Board-approved pre-registration course of nursing/midwifery education, taught and assessed in English, in Australia, is considered to

have demonstrated English language proficiency and has met the requirements of this standard;

b). An applicant for registration as a registered nurse and/or a registered midwife who does not meet the conditions outlined in a), but who has provided evidence of completion of five (5) years\*(full-time equivalent) of education taught and assessed in English, in any of the recognised countries listed in this registration standard, is considered to have demonstrated English language proficiency and has met the requirements of this standard;

c). An applicant for registration as a registered nurse and/or a registered midwife who has not graduated from an Australian institution in Australia or has not completed five (5) years\*(full-time equivalent) of education taught and assessed in English, in any of the other recognised countries listed in this registration standard, will be required to demonstrate English language proficiency in accordance with Board-approved English language tests.

\*The completion of five (5) years (full-time equivalent) education taught and assessed in English means five (5) years full-time equivalent of either:

i). tertiary and secondary; or

ii). tertiary and vocational; or

iii). combined tertiary, secondary and vocational education

taught and assessed in English in any of the recognised countries listed in this registration standard. These five (5) years must include evidence of a minimum of two (2) years full-time equivalent pre-registration program of study approved by the recognised nursing and/or midwifery regulatory body in any of the countries listed in this registration standard other than Australia.

## **Conclusion**

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I am concerned about the lack of evidence for setting registration standard at an IELTS 7/OET B and above as well as the lack of evidence for setting a five-year of study rule for granting exemptions. Applicants who have completed Board-approved courses in Australia are able to provide solid and trustworthy evidence of their language ability by the simple fact that they have successfully completed all components of their course, especially the clinical practice component. I would seem reasonable, therefore, to exempt these candidates from undertaking any language proficiency tests. I would like to encourage the Board to continue to work with nursing/midwifery education providers to ensure their accredited courses provide opportunities for students to develop and consolidate their language skills so that they are clearly and undoubtedly deemed to have met the required language standard upon graduation.