

16 December 2013

Australian Health Practitioner Regulation Agency
standard.consultation@ahpra.gov.au

Dear AHPRA

**Public consultation: Review of criminal history registration standard
Review of English language skills registration standard**

SHPA is the national professional organisation for more than 3,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is the only professional pharmacy organisation with a core base of members practising in public and private hospitals and other health service facilities. These pharmacists work within health care teams with a focus on supporting the safe and effective use of medicines as their core business.

Review of criminal history registration standard

SHPA supports continuing the existing registration standard.

Review of English language skills registration standard

1. From your perspective, how is the current registration standard working?

SHPA believes that the current requirement that pharmacist applicants must achieve an overall score of 7.5 is working well. **We believe that the overall IELTS rating for registration as a pharmacist should be 7.5 at a minimum.**

The need for all pharmacists to communicate clearly with patients, care givers and other health care providers is critical. The ability to communicate in conversational English is essential to the practice of pharmacy and is a crucial competency assessed in the oral examination.

The listening and speaking skills of candidates need to be improved and maintained at a high level so that provisional and registered pharmacists will be employable.

SHPA reiterates our belief that this requirement should be assessed and confirmed earlier in the applicant's training period. Rather than being a requirement for initial registration, it should be included in application for provisional pharmacist registration. Any applicants with an identified problem with their English language skills would then have time to rectify issues prior to sitting the oral examinations, minimising the number of applicants who fail this examination based on their English communication skills.

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?

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SHPA believes that being consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing makes sense.

3. Is there any evidence to assist National Boards to assess whether there are any additional countries that should be recognised in their English language skills registration standard?

No specific comment.

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?

As the English language skills registration standard for pharmacists is being lowered, **SHPA does not support the notion that test results below the standard be accepted in any circumstances.**

5. 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?

As the English language skills registration standard for pharmacists is being lowered, **SHPA does not support the notion that test results from more than one sitting be accepted.**

6. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?

No specific comment.

7. Is there any content that needs to be changed or deleted in the revised draft registration standard?

No additional comments.

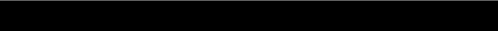
8. Is there anything missing that needs to be added to the revised draft registration standard?

SHPA believes that providers of tertiary education should clearly articulate the English language skills registration standard requirements to their potential students.

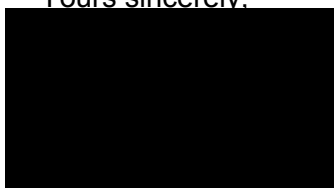
As noted above, we believe that the English language skills registration standard should be included in the application for provisional pharmacist registration.

9. Do you have any other comments on the revised registration draft standard?

SHPA reiterates its belief that the overall IELTS rating for registration as a pharmacist should be 7.5 at a minimum and that test results below the standard should not be accepted under any circumstances.

If you would like to discuss the issues raised in this submission or require further information please contact me 

Yours sincerely,



Professor Michael Dooley
President, SHPA