



Submission on the

Australian Health Practitioner Regulation Agency

Review of the English language skills and Criminal history registration standards

### **Review of Criminal history registration standard**

The National Boards' preferred Option 1 is supported.

### **Review of the English language skills registration standard**

The National Boards' proposed revised standard described in Option 2 is supported. The following comments are provided for consideration.

The additional options available to applicants to demonstrate their English language skills listed in the proposed revised standard are intended to be applied to all the National Boards with the exception of the Aboriginal and Torres Strait Islander Health Practitioner Board of Australia.

The consultation paper states that the final version of the standard will include profession-specific aspects highlighted in red text in the current revised draft. Is it intended that the alternative options for applicants listed in the revised draft be also available to nursing and midwifery applicants once the *Alternative for Nursing and Midwifery* requirements are inserted in this section (pp 15, 16 of 26 of the Consultation draft)?

### **Expanding the list of recognised countries**

It is noted that the Department of Immigration and Citizenship does not exempt visa applicants from South Africa from English language testing. It may be useful for the National Boards to determine the Department's rationale for this before deciding on the continued inclusion of South Africa as one of the recognised countries.

### **English language Proficiency Tests**

The National Boards' proposal to accept results from more than one sitting is supported, providing that results are relatively close to the required level. Applicants could then concentrate on improving the area/skill needed, knowing that previous acceptable results would also be taken into account.

The current position – test results will be accepted if obtained within two years – is supported. The alternatives listed are supported.

### **Additional tests options.**

The Educational Testing Service (ETS) and Cambridge ESOL have undertaken research to establish a comparison between TOEFL iBT and IELTS academic modules. As both



TOEFL iBT and the Cambridge English Advanced have been benchmarked against the IELTS and corresponding results determined, the National Boards may wish to investigate the possibility of including these two tests to those already approved.

### **Comments specific to Nursing and Midwifery Board of Australia**

The overview of the *Review of English Language skills registration standard* states that the Nursing and Midwifery Board of Australia's (NMBS's) English Language Skills registration standard is not due for review until September 2014, but that the Board may consider any new evidence arising from this national review.

My comment relates to the current English language skills requirements for registration for Enrolled Nurses and, in particular, to the statement that five (5) years (full-time education) taught and assessed in English must include evidence of *a minimum of one (1) year full-time* equivalent in a pre-registration program of study approved by the recognised nursing and/or midwifery regulatory body in any of the countries listed in the registration standard.

The Board is requested to consider reducing the one year full-time equivalent in a pre-registration program of study. The Diploma of Nursing (Enrolled/Division 2 Nursing) may be completed in 12-18 months in TAFE NSW depending mainly on location and timing of the professional experience placement. The minimum of one year full-time equivalent for certain locations does not allow for any recognition of prior learning as all students are expected to complete a minimum of one year.

It is requested that the Board consider changing this requirement to a minimum of eight (8) months, comparable to the two years of a three year Bachelor of Nursing requirement.

Thank you for the opportunity to comment on the public consultation on the Review of the English language skills and Criminal history registration standards. I look forward to the proposed review of Nursing and Midwifery Board of Australia's (NMBS's) English Language Skills registration standard in September 2014.

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19<sup>th</sup> December 2013