



Submission template

Public consultation on two further possible changes to the National Boards' English language skills requirements

The Australian Health Practitioner Regulation Agency (Ahpra) and the National Boards (except the Aboriginal and Torres Strait Islander Health Practice Board) are inviting stakeholders to have their say on two further possible changes to the National Boards' English language skills registration requirements.

Please ensure you have read the public consultation paper before answering this survey. There are specific questions we would like you to consider below, including specific issues the Medical Board of Australia is asking its stakeholders to consider in relation to reducing the writing component from 7 to 6.5. All questions are optional and you are welcome to respond to any you find relevant, or that you have a view on.

We are not inviting further feedback on proposed changes to the National Boards' English language skills standards (the ELS standards) that we previously consulted on in 2022.

Your feedback will help us to understand what changes should be made to the ELS standard and will provide information to improve our other work.

Please email your submission to AhpraConsultation@ahpra.gov.au.

The submission deadline is close of business **Wednesday 13 September 2023**.

How do we use the information you provide?

The survey is voluntary. All survey information collected will be treated confidentially and anonymously. Data collected will only be used for the purposes described above.

We may publish data from this survey in all internal documents and any published reports. When we do this, we ensure that any personal or identifiable information is removed.

We do not share your personal information associated with our surveys with any party outside of Ahpra, except as required by law.

The information you provide will be handled in accordance with [Ahpra's Privacy policy](#).

If you have any questions, you can contact AhpraConsultation@ahpra.gov.au or telephone us on **1300 419 495**.

Publication of submissions

We publish submissions at our discretion. We generally [publish submissions on our website](#) to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know if you do not want your submission published.

We will not publish 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.

Australian Health Practitioner Regulation Agency
National Boards
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Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry and psychology.

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 if you 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 expressly requested.

Initial questions
To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.
Question A
Are you completing this submission on behalf of an organisation or as an individual?
Your answer:
<input checked="" type="checkbox"/> Organisation
Name of organisation: The Pharmacy Guild of Australia
Contact email: [REDACTED]
<input type="checkbox"/> Myself
Name: Click or tap here to enter text.
Contact email: Click or tap here to enter text.
Question B
If you are completing this submission as an individual, are you:
<input type="checkbox"/> A registered health practitioner?
Profession: Click or tap here to enter text.
<input type="checkbox"/> A member of the public?
<input type="checkbox"/> Other: Click or tap here to enter text.
Question C
Would you like your submission to be published?
<input checked="" type="checkbox"/> Yes – publish my submission with my name/organisation name
Please redact email address
<input type="checkbox"/> Yes – publish my submission without my name/organisation name
<input type="checkbox"/> No – do not publish my submission

Possible change one – Setting the minimum requirements for the writing component of an English language test from 7 to 6.5 IELTS equivalent and 7 in each of the other three components (reading, speaking and listening) with an overall score requirement of 7

One way to meet the National Boards' ELS standards is to achieve the minimum scores in an approved English language test. These tests assess an applicant's English language skills in speaking, listening, reading and writing.

The test pathway in the ELS standards is used by just under a quarter of applicants across the regulated health professions. National Boards currently require an overall score of IELTS 7 or equivalent but enable the scores of 7 in each component (writing, speaking, reading and listening) to be achieved over two sittings.

Question 1

Do you support reducing the score for the writing component of IELTS by half a band to 6.5 (or equivalent for other accepted English language skills tests) as proposed in the [Kruk review](#)? Why or why not?

Your answer:

The Pharmacy Guild opposes the proposal to reduce the writing component of IELTS by half a band from 7 to 6.5.

The Guild believes that it is vitally important that health professionals are able to communicate effectively in writing for reasons of patient safety and clinical effectiveness.

All health professionals must be able to effectively write many documents, including:

- Contemporaneous clinical notes
- Descriptive (qualitative) observations of patient condition
- Treatments, products and medicines prescribed for patients
- Instructions (how to) for treatment
- Records of procedures, treatments and medicines administered
- Instructions for patients, family members and carers
- Prescriptions
- Orders for pathology or imaging
- Reports and review documents
- Patient histories
- Health summaries (such as on My Health Record)
- Discharge summaries
- Inter-professional communication and referrals.

It is vital that these records and communications are clear, consistent, unambiguous and easily interpreted by other health professionals and by patients and carers.

Considering the IELTS band descriptors (supplied), the following differences are identified:

IELTS 7:

- The content is relevant and accurate...
- A few errors in grammar may persist, but these do not impede communication.
- Information and ideas are logically organised...

IELTS 6:

- Some irrelevant, inappropriate or inaccurate information may occur in areas of detail or when illustrating or extending the main points.
- Some details may be missing (or excessive)...
- The resource is generally adequate and appropriate for the task.
- Errors in grammar and punctuation occur, but rarely impede communication.

It is not acceptable that written communication by health professionals might be “sometimes inappropriate or inaccurate”. It is not acceptable that details could be missing from communication. It would be disappointing if communication from health professionals was only “generally adequate” and only “rarely impeded communication”. Any inadequacy in communicating in written English places patients at risk.

The Guild does not agree with premise [Consultation paper, item 17] that writing skills have changed due to “uptake of computing and word-processing technologies, including in healthcare. Increased electronic capture of information is also simplifying writing tasks. There is an increase in checklists and other electronic health records with repeated use of templates likely simplifying writing tasks.”

The use of and widespread availability of information technology systems and the principles of collaborative interprofessional care mean that clinical notes and reports are more likely to be viewed and read by a larger number of professionals involved in the care of a patient. The quality of written documentation matters and it is crucial that notes and correspondence are accurate, unambiguous and not subject to misinterpretation.

The Guild does not believe that lowering the written English standard will lead to a meaningful increase in the health professional skilled migration workforce. The Guild understands that written English language skills are not the point of greatest resistance compared to complicated assessment pathways, processing delays, duration of English test validity, visa complexity, limits on total immigration numbers and barriers to permanent residency all have greater impact on immigration intent compared to the written English hurdle requirement of the IELTS test.

Additional considerations and questions for Medical Board of Australia stakeholders

The Medical Board of Australia has reservations about reducing the current writing component from 7 to 6.5 (IELTS equivalent) for applicants looking to register as medical practitioners in Australia as most comparable medical regulators require applicants to meet a minimum of 7. **Attachment B** of the consultation paper provides an overview of the scores comparable medical regulators from the United Kingdom, Ireland, New Zealand, and Canada require applicants to meet when sitting an English language test.

Question 2 (This question is most relevant to Medical Board of Australia stakeholders)

Do you have any specific views about the Kruk review recommendation to reduce the writing requirements for medical practitioners?

Your answer:

A key principle of the Kruk Review (p.25) was that “Quality and safety standards designed to protect patients must be maintained.” Any reduction in the (IELTS equivalent) writing requirement would represent a reduction in the quality and safety standards designed to protect patients.

The Interim Report of the Kruk Review claims that “Our requirements to demonstrate the written standards are higher than in the United Kingdom (UK) and New Zealand (NZ).” Yet Attachment B: Comparable medical regulators IELTS English language test scores shows that this is not the case.

The Guild identifies that medical practitioners must be able to write a wide range of documentation that other health practitioners, patients and carers must be able to clearly interpret. These include:

- Instructions for treatment
- Prescriptions, including for high-risk medicines
- Orders for pathology or imaging
- Observations and Clinical notes
- Records of procedures and treatment administered
- Reports and review documents
- Discharge summaries
- Referrals and interprofessional correspondence.

These are potentially high-risk tasks and medical practitioners in particular must be able to complete such written tasks accurately, reliably, consistently and unambiguously.

Possible change two: Expanding the range of recognised countries where available information supports doing so

The countries that are recognised by National Boards in the standards have health and education systems largely equivalent to those in Australia. Health and education services in these countries are also typically delivered in English. This means National Boards can be confident that people who qualified in these countries have a level of English that is safe for practise in Australia. National Boards have significant regulatory experience with applicants from the countries recognised in the standard both before and during the National Registration and Accreditation Scheme.

The countries currently recognised by National Boards are one of the following countries:

- Australia
- Canada
- New Zealand
- Republic of Ireland
- South Africa
- United Kingdom
- United States of America.

A recent review of similar health practitioner regulators indicates there is an opportunity to expand the recognised country list to better align with UK and NZ. For example, the UK Visas and Immigration (UKVI) list or a comparative regulator like the UK Nursing and Midwifery Council (the UK NMC) recognised country list, indicate that citizens educated and working in those countries would have the English language skills needed for practice in Australia.

It can be complex to identify countries where the National Boards can be confident applicants will have the necessary English skills. The National Boards need objective evidence that applicants are able to speak, write, listen and read English to safely practise the profession. For example, if a country has multiple official languages, then English being one of the official languages means that the National Boards would need more information about a candidate’s English language skills, not just their country of origin or education.

Question 3

Do you support adding proposed countries where evidence supports doing so as proposed in the Kruk review such as those listed in **Appendix A** of the consultation paper?

Your answer:

The Pharmacy Guild supports expanding the range of recognised countries by the inclusion of additional countries such as those listed in Appendix A.

Question 4

Are there any countries missing from those listed in **Appendix A** where evidence supports inclusion?

Your answer:

No comment.

Question 5

If these two changes are adopted to the ELS standards would they result in any potential negative or unintended effects for people vulnerable to harm in the community? [\[1\]](#) If so, please describe them.

[\[1\]](#) Such as children, the aged, those living with disability, people who have experienced or are at risk of family and domestic violence

Your answer:

Communication in written English is an essential requirement for the delivery of healthcare. Vulnerable people (such as those listed) are frequent consumers of healthcare.

Any reduction in the written English language standard requirements has the potential to reduce the quality of documentation written by health professionals, including:

- Instructions for treatment
- Prescriptions, including for high-risk medicines
- Orders for pathology or imaging
- Observations and Clinical notes
- Reports and review documents
- Records of procedures and treatment administered
- Discharge summaries
- Referrals and interprofessional correspondence.

If these documents are less clear because the written literacy of health professionals is poorer, then individuals, including people vulnerable to harm in the community, may be put at risk from adverse health outcomes.

Question 6

If these two changes are adopted to the ELS standards, would they result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples? If so, please describe them.

Your answer:

Communication in written English is an essential requirement for the delivery of healthcare. Aboriginal and Torres Strait Islander People have generally poorer health and greater healthcare needs. They are more frequent consumers of healthcare.

Any reduction in the written English language

standard requirements has the potential to reduce the quality of documentation written by health professionals, including:

- Instructions for treatment
- Prescriptions, including for high-risk medicines
- Orders for pathology or imaging
- Observations and Clinical notes
- Reports and review documents
- Records of procedures and treatment administered
- Discharge summaries
- Referrals and interprofessional correspondence.

If these documents are less clear because the written literacy of health professionals is poorer, then individuals, including Aboriginal and Torres Strait Islander People, may be put at risk from adverse health outcomes.