



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
GPO Box 9958 Melbourne VIC 3001 Ahpra.gov.au 1300 419 495

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: Australian Dental Association
Contact email: [REDACTED]
<input type="checkbox"/> Myself
Name: Mr Damian Mitsch
Contact email: [REDACTED]
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
<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:

We consider there to be an uneven distribution of dentists between metropolitan and regional areas in Australia, but not an overall shortage of dentists nationally. We understand foreign trained dentists who immigrate to Australia are more likely to settle in metropolitan areas than regional areas. We don't anticipate that reducing the IELTS standard would resolve unevenness of distribution.

We understand reducing the score for the writing component of IELTS by half a band to 6.5 could be expected to increase miscommunication in clinical settings. The complexity of dental procedures, treatment plans, and costs of treatment – and informed consent relating to same – tend to require a high level of communication skills. Reduction of the standard might contribute to suboptimal outcomes.

We thought it useful to contrast approaches in comparable jurisdictions, and include a summary of relevant standards below for reference:

- New Zealand's Dental Council mandates a minimum average score of 7.5, with no less than 7 in each of the four individual components: listening, reading, writing, and speaking¹;
- the National Dental Examining Board of Canada requires a score of 7 in each band²;
- the Dental Council of Ireland stipulates a minimum of 7 in each band³; and
- the UK General Dental Council departs from the above approaches, requiring an overall average of 7, with scores of at least 6.5 in each band.⁴

Having regard to the above factors, we do not currently 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) for dentists.

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

¹ [English language » Dental Council \(dcnz.org.nz\)](#)

² [What Language Proficiency Requirements Do You Need to Become a Dentist in Canada? - Prep Doctors Education](#)

³ [Language proficiency – Dental Council of Ireland](#)

⁴ [gdc-guidance-on-english-language-controls.pdf \(gdc-uk.org\)](#)

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:

The Kruk review was mostly silent on dentistry, however, many of the considerations that apply to medicine also apply to dentistry.

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:

We presently do not oppose adding proposed countries where evidence convincingly supports doing so.

We appreciate the increasing challenge of identifying countries where National Boards can be confident that applicants possess the required level of English proficiency.

We agree that if a country has multiple official languages, with English *one* of the official languages, National Boards would need more information about a candidate's English language skills, not just their country of origin or education.

Question 4

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

Your answer:

Special consideration should be given to individuals whose country of origin is Wales in the UK. Many are required to do IELTS as the predominant language in schools is Welsh, although this does not preclude them from speaking fluent English.

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? [11](#) If so, please describe them.

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

Your answer:

If these two changes were adopted to the ELS standards, we're not aware of particular negative or unintended effects for people vulnerable to harm in the community. However, it seems probable that certain individuals could experience any impacts more acutely than other community members might.

It might be useful to recognise and consider potential risks along with potential benefits, such as potentially enhanced health practitioner availability.

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:

If these two changes were adopted to the ELS standards, we're not aware of particular negative or unintended effects for Aboriginal and Torres Strait Islander Peoples. However, it seems probable that certain individuals could experience any impacts more acutely than other community members might.

It might be useful to recognise and consider potential risks along with potential benefits, such as potentially enhanced health practitioner availability.