

23 November 2009

Ms Anne Copeland
Chair
Nurses and Midwifery Board of Australia
PO Box 16085
Collins Street
WEST MELBOURNE VIC 8007



Dear Anne

Consultation on draft registration standards and related matters

Thank you for providing the Australian Nursing and Midwifery Council (ANMC) with the opportunity to comment on the draft registration standards and related matters for the nursing and midwifery professions.

The ANMC, through its constituent members the NMRA's and Council's Registration Standards Committee has extensive experience of the development of registration standards nationally and is very pleased to have the opportunity to offer the benefit of that experience to the Nursing and Midwifery Board of Australia (NMBA).

The ANMC was established in 1992 to facilitate a national approach to nursing and midwifery regulation. It is the peak body that works with state and territory Nursing and Midwifery Regulatory Authorities (NMRAs) in evolving standards for statutory nursing and midwifery regulation. These standards are flexible, effective and responsive to the health care requirements of the Australian population.

The ANMC's primary function is to safeguard the healthcare interests of the community by formulating and promoting high standards of nursing and midwifery practice.

2.2 English language skills

The ANMC position is that the definition of "international student" is inadequate and that the standard should be applied to all entry to practice applicants.

The English language skills standard summary should read:

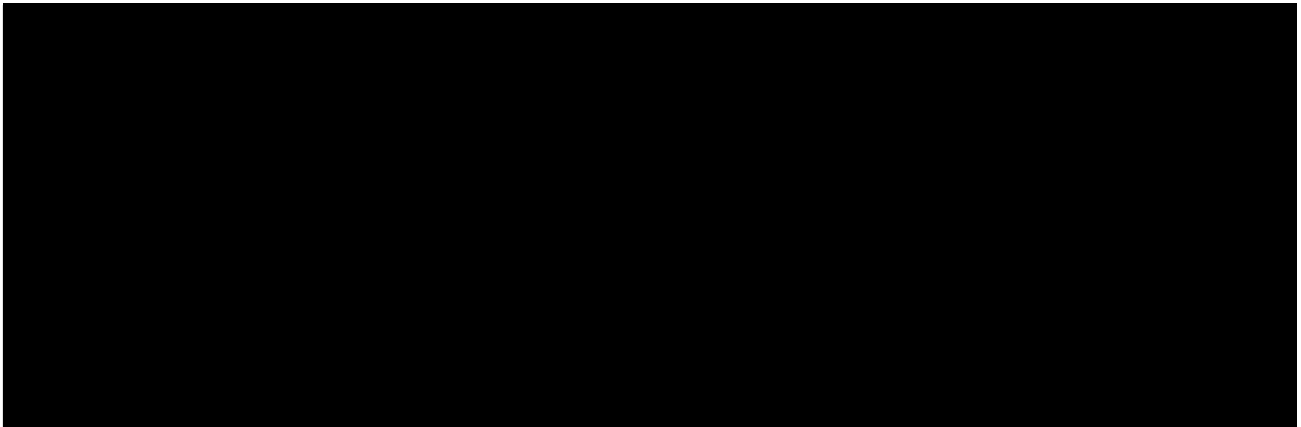
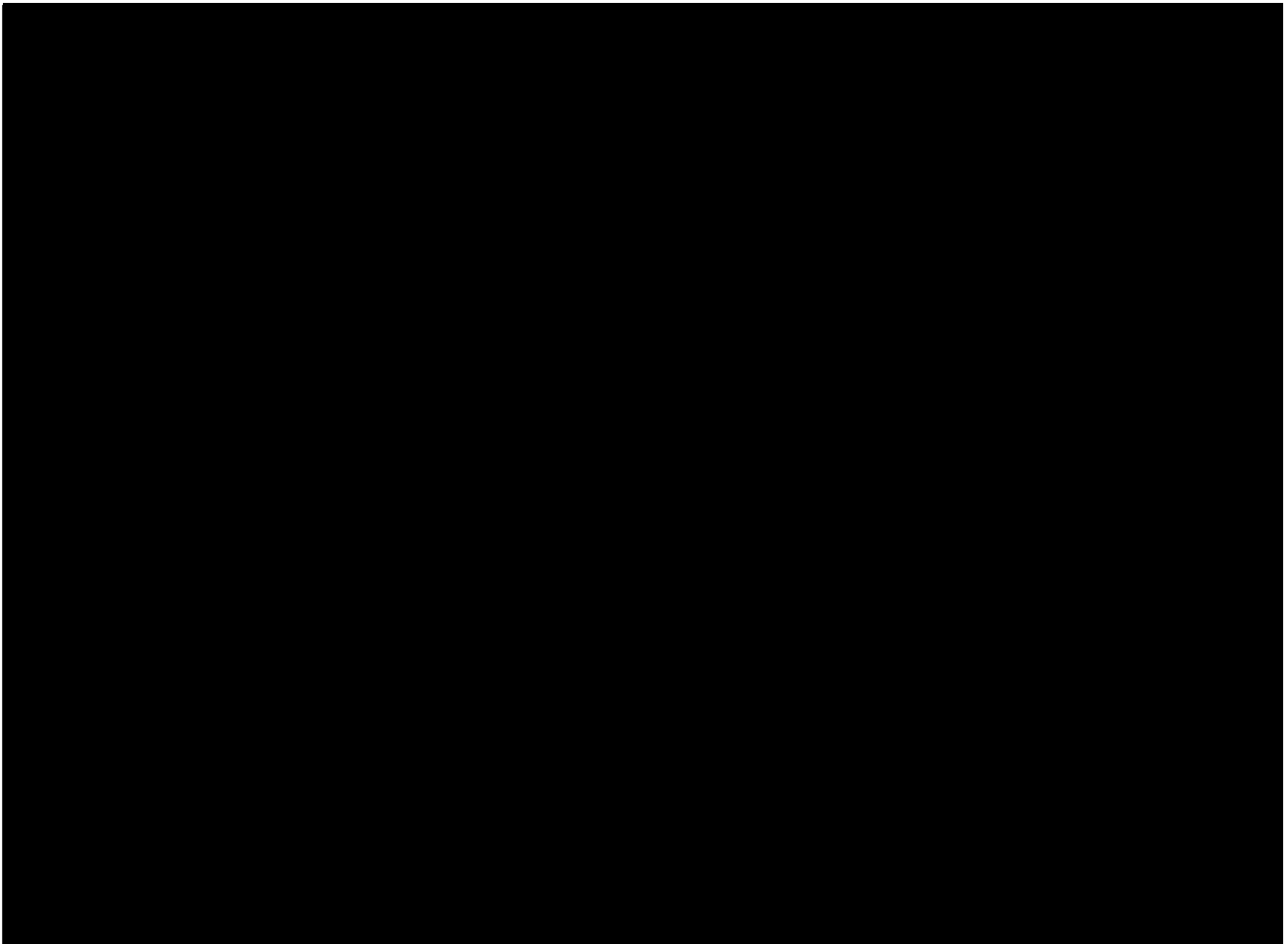
'An internationally qualified applicant or an applicant who is an international student must have the necessary English language skills for registration purposes by achieving a score of 7 in all four bands IELTS academic module, OET or specified alternatives (see 'Definitions' below).'

The ANMC disagree with English language skills standard requirement 4. ANMC position is that any English language test result that is more than two years old is invalid for assessment purposes.

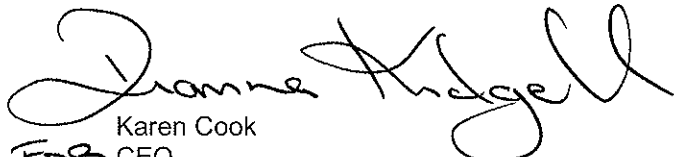
The ANMC disagrees with English language skills standard requirement 7. Applicants must arrange for results to be sent directly to the Board – a secure internet log- in is not acceptable and should only be performed by the Board as a further security measure.

English Language Skills Standard: Exemptions

Current ANMC standards do not provide for any exemptions of the provision of English Language Proficiency by internationally trained nurses / midwives. ANMC acknowledges that the document states "The Board **may** grant exemptions" indicating that this may not happen and thus remove all countries. ANMC, in alignment with the Department of Immigration and Citizenship, does not accept South Africa or Canadian French speaking provinces as countries where English is the native or first language.



Yours Sincerely


For Karen Cook
CEO
Australian Nursing and Midwifery Council