THE PHARMACY BOARD OF TASMANIA

Registrar

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NATIONAL REGISTRATION/REG STDS/PBRESPONSE

20 November 2009

Mr S Marty Chairman Pharmacy Board of Australia

E-mail:natboards@dhs.vic.gov.au

Dear Steve

NATIONAL REGISTRATION AND ACCREDITATION SCHEME CONSULTATION ON REGISTRATION STANDARDS

The Pharmacy Board of Tasmania wishes to provide the following feedback on the draft registration standards issued by the Pharmacy Board of Australia for comment:



2. English language

The Board notes that although the preamble to this standard suggests that the common standard contains some specific adjustments for pharmacy, these adjustments are not apparent. The Board considers that the standard **should** be adjusted to account for some specific requirements of pharmacy.

The scope of application of the standard is not clear in the case of pharmacy which will have student registrants, provisional registrants and general registrants.

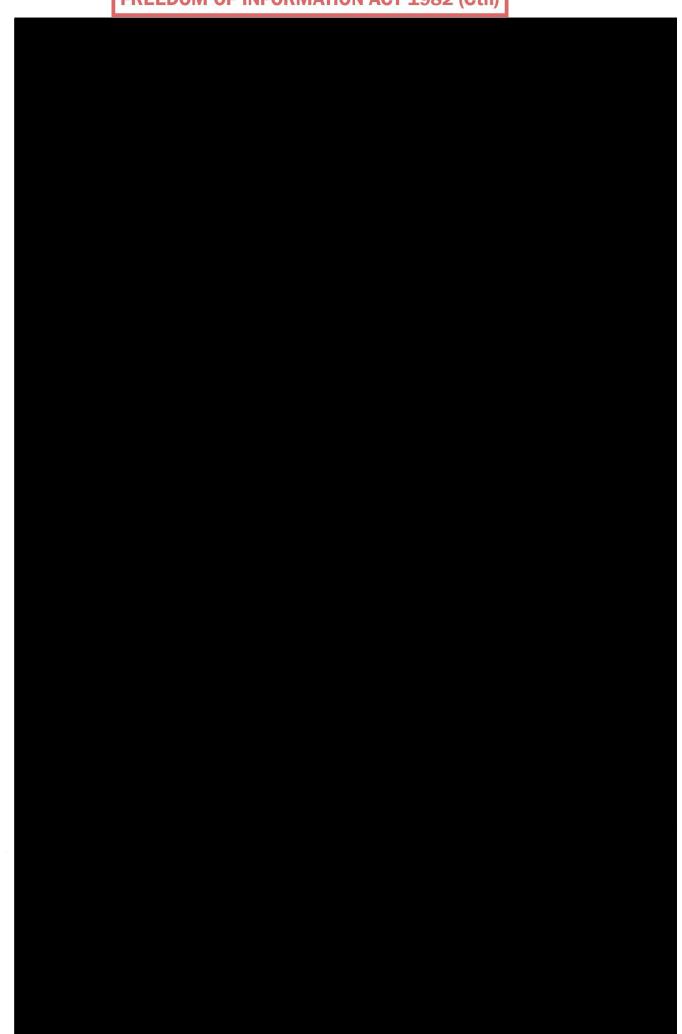
The Board considers that the current standard of 7.5 in the IELTS academic module (or equivalent) should be retained for all applicants for provisional and general registration in pharmacy.

At present, the English language requirements for entrants to Australian and New Zealand university pharmacy programs are fixed by each University. This should remain with the universities and therefore the scope of the standard should be adjusted to exclude student registrants.

The proposed standard accepts a pass in the Occupational English Test (OET) with grades A or B only in the 4 components as an acceptable alternative to the required IELTS score. Both IELTS and OET results are presently accepted for the purposes of verifying minimum English language competence of pharmacists. PLAB and NZREX are not currently used for pharmacy and should not be included in the standard.

The Summary and requirement 3 appear to be inconsistent in that the requirement is that results **must** have been obtained within 2 years prior to applying for registration but the Summary says results will **generally** need to be obtained within 2 years but preferably within 12 months.

The Board doe not support the listing of specific countries in Exemption 1. The Board suggests that applicants should be able to apply for exemption if both their secondary **and** tertiary education in the relevant professional discipline were taught and assessed in English in any country where English is the native or first language. The board notes that French is the first language in a significant area of Canada.



Yours sincerely,

Registrar

