

## Surrounding the 20220824 - English language skills registration standard review - submission template

The National Boards are inviting general comments on a revised *English language skills registration standard* (ELS standard) as well as feedback on the following questions. All questions are optional, and you are welcome to respond to as many as are relevant or that you have a view on.

**Published submissions will include the names (if provided) of the individuals and/or the organisations that made the response unless confidentiality is requested.**

Do you want your responses to be published?

☒ **Yes I want my responses to be published**

☐ ~~No I do not want my responses to be published~~

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### 1. Is the content, language and structure of the proposed revised ELS standard clear, relevant and workable? Why or why not?

The OHO believes that the content, language, and structure of the proposed revised ELS standard is clear, relevant, and workable.

The renaming and strengthening of the pathways, review and clarification of the recognised country list and editorial changes, make the ELS standard clear, as the current standard has not remained contemporaneous with the communities' expectations and current practice.

### 2. Is there any content that needs to be changed, added or removed in the proposed revised ELS standard? If so, please provide details.

The OHO is of the opinion that the proposed revised ELS standards have an appropriate structure and content and do not need any further significant changes, additions, or removals.

### 3. Please see consultation paper for all proposed changes to the ELS pathways. Some of the main changes proposed to the ELS pathways are:

- clear naming of four pathways within the Standard
- reorganised content to make the sequence more logical, and
- minor rewording.

**Are the proposed pathways clear, relevant and workable? Why or why not?**

The OHO is of the opinion that the proposed pathways are clear, relevant, and workable. The changes to the naming of the pathways make them understandable and easy to follow by the registrant / potential registrant.

The reorganised content facilitates flow from the pathway most often used through to the pathway that is rarely used. The only area where the sequence may be out of order is between the Advanced Education Pathway and Test Pathway, where approximately 25% of candidates undertake the testing process and minimal number of candidates go through the Advanced Education Pathway.

This issue could be addressed through grouping the pathways together visually as demonstrated below:

Education Pathway, or	Combined Education Pathway, or
	School Education Pathway, or
	Advanced Education Pathway
Test Pathway	

4. The pathways have been re-named to help applicants understand them better. The pathways have been reordered and additional guidance provided to applicants on which pathway may be suitable.

It is proposed to name the four pathways as follows:

- Combined education pathway (no change to current pathway name)
- School education pathway (currently named the primary language pathway)
- Advanced education pathway (currently named the extended education pathway)
- Test pathway (no change to current pathway name)

**Are the new names for the pathways helpful and clear? Why or why not?**

The OHO believes that the new names for the pathways are helpful and clear in providing the candidates information relevant to the appropriate section of the ELS standard. The names provide initial guidance to candidates as to which pathway may be appropriate for them.

There may be confusion surrounding the Advanced education pathway, which could be addressed through grouping the pathways together as an education pathway and test pathway, as demonstrated above in Q3.

5. **Is it helpful to include examples in the definitions section of the ELS standard for example those included in the Full time equivalent definition or would the examples be better placed in the supporting material (for example in Frequently Asked Questions)? Why or why not?**

The OHO is of the opinion that including examples in the definitions section of the ELS standard provides the potential candidate the appropriate information at the point of when it is required.

The inclusion of the definitions and examples solely within the supporting material may lead to the confusion of the potential candidates as the supporting information may not be available at the point of access.

6. The current ELS registration standards allow applicants to combine test results from two sittings within six months subject to certain requirements as set out within the respective National Boards' ELS registration standards. The revised ELS standard is proposing to change the time period for accepting test results from two test sittings to 12 months.

**Is the proposed change to the time period for accepting test results, from two test sittings from a maximum of six months to 12 months, workable? Why or why not?**

The OHO is of the opinion that extending the time period from 6 to 12 months for accepting test results from two test sittings is appropriate in the current health and political environment, as

accessing appropriately supervised and validated tests may be difficult. This will ensure that candidates will not be discriminated against based on location.

As identified in the literature review, the OHO would like to reinforce that the “shelf-life” period of the test results must remain at 2 years, that is the tests must be completed in the two years prior to application.

**7. Is there anything else the National Boards should consider in its proposal to revise the ELS standards?**

The OHO believes that AHPRA and the National Boards should monitor practitioner notifications to identify trends in complaints related to communication and review these trends to ensure that the English language skills standards are meeting the needs of the health professions and community.

The OHO identifies that effective communication between practitioner and patient and between health practitioners is essential to the provision of safe and effective care and the above monitoring will help ensure that the ELS standard is contributing to this.

**8. The proposed draft standard sets out the currently accepted test types and modalities and provides that National Boards could approve additional test types and modalities if satisfied that these tests meet the requirements of a high stakes test for the purpose of registration. Information about any additional tests approved by National Boards would be published on the Ahpra website**

**9. Are there any additional considerations National Boards should be aware of when deciding whether to approve a new test modality or type by an accepted English language test provider as suitable for the purposes of meeting the ELS standard?**

The OHO believes that the ELS registration standard should remain the same across all the National Boards (with the current exceptions of the Nursing and Midwifery Board of Australia and Aboriginal and Torres Strait Islander Health Practice Board).

If a new test modality is identified as being acceptable, it needs to be acceptable to all the National boards prior to being identified as suitable for the purposes of meeting the ELS standard. The OHO is not supportive of new multiple ELS standards for health practitioners.

The National Boards are also interested in your views on the following specific questions:

**10. Would the proposed changes to the ELS pathways result in any adverse cost implications for practitioners, patients/clients/consumers or other stakeholders? If yes, please describe.**

The OHO is of the opinion that the proposed changes will have minimal adverse cost implications for practitioners, patients/clients/consumers, or other stakeholders.

The only cohort where there may be increased cost implications is when a practitioner is looking to register in Australia after training in South Africa. The proposed changes will mean that they may have to follow the test pathway instead of the education pathway prior to gaining registration.

**11. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.**

The OHO believes that the proposed changes to the ELS standards will not result in any potential negative or unintended effects. The revised ELS standard will contribute to the maintenance of

the provision of safe and effective healthcare within Australia by ensuring health practitioners are able to appropriately communicate with patients and other health practitioners.

**12. Would the proposed changes to the ELS standards result in any potential negative or unintended effects for people vulnerable to harm<sup>1</sup> in the community? If so, please describe them.**

The OHO believes that the proposed changes to the ELS standards will not result in any potential negative or unintended effects for those who are vulnerable to harm in the community.

**13. Would the proposed changes to the ELS standards result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples? If so, please describe them.**

As the Aboriginal and Torres Strait Islander Health Practice Board is not included in this standard the OHO believes that the proposed changes to the ELS standards will not result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples.

**Do you have any other feedback about the ELS standards?**

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<sup>1</sup> Such as children, the aged, those living with disability, people who are the potential targets of family and domestic violence