

## ENGLISH LANGUAGE SKILLS REGISTRATION STANDARD REVIEW - SUBMISSION TEMPLATE

All questions are optional, and you are welcome to respond to as many as are relevant or that you have a view on.

Name: [REDACTED]

Organisation: Australian Dental Association

Contact email: [REDACTED]

<b>1. Is the content, language and structure of the proposed revised ELS standard clear, relevant and workable? Why or why not?</b>
Yes.
<b>2. Is there any content that needs to be changed, added or removed in the proposed revised ELS standard? If so, please give details.</b>
<p>Presenting the available pathways in order of the likely number of applicants seems like a reasonable proposal.</p> <p>For some italicised text used in <i>Attachment B – ELS standards comparison table</i>; the logic for italicising isn't clear or appears inconsistent.</p>
<b>3. Are the proposed pathways clear, relevant and workable? Why or why not?</b>
<p>Pathways could potentially be named (with numbering omitted), if considered helpful, to minimise the possible impression of escalating or de-escalating preference or difficulty.</p> <p>For the 'advanced education pathway', we understand research has found that students' English language proficiency does not automatically improve, that universities have conflicting interests concerning enrolments, and that many universities admit students at IELTS 6.5, and lower. Therefore, as noted in the consultation paper, students 'may not make sufficient proficiency gains by the time they graduate to reach a level equivalent to IELTS 7.0'.</p>
<b>4. Are the new names for the pathways helpful and clear? Why or why not?</b>
<p><i>(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).</i></p>
Yes.
<b>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?</b>
Yes, including examples in the definitions section of the ELS standard, such as those included in the Full-time equivalent definition seems fine.

**6. 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 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 proposes to change the period for accepting test results from two test sittings to 12 months).*

Yes. Changing the period for accepting test results from two test sittings – from a maximum of six months – to 12 months – wouldn't be problematic in any way that is apparent to us, and should be helpful for applicants.

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

Academic English tests such as IELTS, Cambridge and TOEFL, while extensively recognised and benchmarked are not specific to a particular country, or workplace setting, such as healthcare.

Communicating to patients about dental procedures can be difficult. And even minor language barriers may raise questions about informed consent.

The National Boards might consider whether an additional vocational, face to face (or via video conference) verbal interaction test, using scenarios involving clinical staff, and patients, could be of sufficient benefit to consider implementing.

*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*

**8. 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?**

We are not aware of any.

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

**9. 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.**

We are not aware of any.

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

We are not aware of any.

**11. 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.**

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

We are not aware of any.

However, more research will be valuable to identify what clinicians and patients value in relevant communications.

**12. 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.**

We are not aware of any.

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

In the table at page 26, the Dental Board of Australia (DBA) ELS standard – General, ‘current’ state is:

*As per common ELS standard except Exemption section has additional wording in 1c: to undertake a period of postgraduate study or supervised training that involves no patient contact while working in an appropriately supported environment that will ensure patient safety is not compromised*

We note the ‘proposed’ state:

*As detailed above with common ELS standard*

*Align with existing wording for all other professions*

However, we may not fully appreciate the effects of the change proposed and would value further clarification on this point.