

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

Name: _____

Organisation: _Council of Deans of Nursing and Midwifery (Australia and New Zealand)_____

Contact email: _____

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

Yes, the CDN M finds the content, language and structure of the proposed revised ELS standard clear, relevant and workable. In particular, the revised pathway names and the addition of case studies provide further clarity.

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

No.

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 order of the four pathways is more logical and the CDN M finds the tables and colour-coding helpful. However, the document remains quite wordy and could benefit from a flow chart or diagram to provide a simplified overview of the four pathways.

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:

<ul style="list-style-type: none"> • 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) <p>Are the new names for the pathways helpful and clear? Why or why not?</p>
<p>Yes, overall, the Council finds the names of the new pathways to be more appropriate.</p> <p>In particular, the CDNМ believes that the term “school education pathway” provides much more clarity than “primary language pathway”.</p> <p>However, re-naming “extended education to “advanced education” may not be necessary.</p> <p>In addition, the details/descriptions provided in the “advanced education” pathway are clearer than they were previously.</p>
<p>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?</p>
<p>The CDNМ believes that definitions should be included at the end of the document to enable the reader to review the terminology definitions as they are reading the document, rather than having to spend additional time searching through a separate document.</p>
<p>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?</p>
<p>Yes, having two sittings across 12 months is appropriate.</p> <p>However, it should be clarified whether the 12-month time period for accepting test results is counted from the time that they took Test 1 or Test 2.</p>
<p>7. Is there anything else the National Boards should consider in its proposal to revise the ELS standards?</p>
<p>The Council notes that OET and PTE Academic tests are included in the Test pathway.</p> <p>There have been cases where many students who have not been able to pass the IELTS English language test would then go on to do extraordinarily well in the PTE Academic test.</p> <p>The PTE Academic assessment appears to be how most students are gaining the English Language Proficiency requirement for entry into the programs. This has led to some concerns about whether these students have a level of English Language Proficiency to support safe practice.</p>

This phenomenon has also been noted when overseas qualified nurses have undertaken the OET with a comment from a participant that they knew the OET would be easier. They then admitted that they did not understand when people were speaking English to them.

Therefore, we would be interested in seeing the 'evidence' that was mentioned in the statement 'evidence from the review supports continued acceptance of all four tests.'

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?

No, however, we would like to note that the Cambridge test pathway is currently under consideration at some universities.

Regarding additional tests, the National Boards should ensure that the tests are consistent across all boards when undertaking the approval process.

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.

Yes, there is a cost implication for nursing/midwifery students.

Currently, the Australian Nursing and Midwifery Accreditation Council (ANMAC) stipulates in accreditation standards that the NMBA English Language Standards need to be met on admission to an undergraduate nursing and/or midwifery degree in Australia.

Having to apply these standards on application to courses, in most cases, leaves only two pathway options for nursing and midwifery applicants – either the School Education pathway or the Test pathway.

Undertaking a Test to be admitted into an undergraduate nursing and/or midwifery degree in Australia places an additional financial burden on applicants, when on course completion they would meet the Combined Education pathway.

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

No

12. Would the proposed changes to the ELS standards result in any potential negative or unintended effects for people vulnerable to harm¹ in the community? If so, please describe them.

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

While the changes may not directly affect vulnerable members of the community, they may experience difficulty providing evidence of meeting the school education pathway.

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 above, the changes may not directly negatively impact Aboriginal and Torres Strait Islander Peoples. However, meeting the School Education Pathway may be problematic for some as these applicants must meet those fixed requirements on admission to the course.

Do you have any other feedback about the ELS standards?

The CDNM would like to request that the NMBA period of 're-adjustment' is quantified. This would enable stakeholders to be better prepared to implement these new changes. This is important as there are substantial changes in the processes at universities to get admission requirements, policy and/or procedures.