

Strategy and Policy Directorate
Australian Health Practitioner Regulation Agency
Melbourne VIC 3001

Email: [REDACTED]

Re: English Language Skills Registration Standards Consultation

Dear [REDACTED],

The Australian College of Nursing (ACN) would like to thank the Australian Health Practitioner Regulation Agency for the opportunity to comment on the **English Language Skills Registration Standards**.

As a national leader of the nursing profession, ACN supports all measures to ensure the health and wellbeing of the Australian community. Ensuring that health practitioners across the board have sound English language skills is essential to ensure a patient or client is provided with care suited to their ailment and that the patient or client understands what the treatment entails.

ACN's members provided input into this consultation. ACN's response follows.

If you require further information, please don't hesitate to contact me, Carolyn Stapleton, Director of Policy and Advocacy, at [REDACTED].

Yours sincerely,

[REDACTED]

Dr Carolyn Stapleton FACN
Director – Policy and Advocacy
Australian College of Nursing

12 September 2022

Consultation

English Language Skills Registration Standards

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

Yes. The language is clear, relevant and accessible.

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

No

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

Pathways are workable and allow for a variety of situations. The Cambridge Tests are a welcome addition to the tests already nominated. The pathways appear quite stringent and ensure a good mastery of the English language for those entering the various medical professions as described.

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

They are descriptive names which are fit for purpose and help users navigate the options.

5. **Is it helpful to include examples in the definitions section of the ELS standards 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?**

There was a division of opinion over placement of the supporting material. Some members thought the definitions in the main text would allow easier access to understanding the definitions while others believed the definitions should be in the supporting material. Consider placing a comprehensive definition in the supporting material and a shorter definition in text to allow an uninterrupted flow while reading.

ACN members raised concerns about the use of the names in case studies used to illustrate pathways for people from overseas. While appreciating the intent of using culturally diverse names, there was a concern about the examples, suggesting they appeared to reflect a stereotypical attitude towards the potential applicants. Suggest reviewing the case studies and asking for feedback from practitioners from overseas who have gained registration in Australia.

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?**

ACN members considered this a good idea. It allows more flexibility for booking a test and should not pose any disadvantage. It might also allow some who need extra English abilities to gain proficiency in the timeframe.

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

No

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?

There was some concern expressed about possible unfair treatments, about imposing a new and untried test on new applicants. Also, the new test may not assess to a standard agreed upon by all the National Boards. Consider a time period for review of an English language test before it is accepted as suitable for use as an English language test for the overseas applicants.

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.

The 12-month time allowed for testing might adversely impact a business-owner who is keen to employ an identified overseas qualified practitioner whose English language skills fall short of expectations. This type of experience might potentially make some business owners more hesitant about employing practitioners from overseas.

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

There may be negative implications of removing South Africa from the list of approved countries. ACN members considered some applicants may be disadvantaged from this decision if English is indeed their primary language and their training has been conducted in South African learning institutions. This may make South African applicants reconsider a work opportunity in Australia.

Removing all of South Africa – and Singapore, Malaysia, and Hong Kong - seems to be a strangely blanket statement that fails to view the worth and value of some learning institutions from these countries. ACN members acknowledge the Department of Home Affairs alignment in this decision. However, developing from these countries a list of providers who expect a high level of English language skills would be a more equitable and fairer decision.

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

ACN members did not consider the changes would impact vulnerable people any more or less than the previous standards. Members were concerned about the charges for obtaining an English language test and considered that some recent migrants to Australia might have difficulty paying for such a test. Some women might also experience difficulties gaining sufficient funds to sit the test. ACN suggests reviewing charges and enabling access to testing without an initial charge, but with a repayment requirement that activated when the applicant was fully employed.

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.

ACN members consider the Aboriginal and Torres Strait Islander Health Practice Board of Australia's own review, which sits outside of this consultation, is valuable and fair and will ensure

there are no potential negative or unintended consequences for Aboriginal and Torres Strait Islander peoples.

13. Do you have any other feedback about the ELS standards?

No. The standards are clear and should allow overseas applicants a transparent pathway to gaining registration in a medically oriented profession.