

16 December 2013

Mr Martin Fletcher
CEO / AHPRA
GPO Box 9958
Melbourne VIC 3001

standard.consultation@ahpra.gov.au

Dear Mr Fletcher

Re: Review of criminal history registration standard and English language skills registration standard

The Royal Australian College of General Practitioners (RACGP) thanks the Australian Health Practitioner Regulation Agency (AHPRA) for the opportunity to provide comment on the above-noted registration standards currently under review.

The RACGP is the specialty medical college for general practice in Australia, responsible for defining the nature of the discipline, setting and maintaining the curriculum and standards for education, training and quality general practice and for supporting GPs in their pursuit of clinical excellence and community service.

Criminal History Registration Standard

The *Criminal History Registration Standard* lists the factors that all National Boards will consider when deciding whether a health practitioner's criminal history is relevant to the practice of their profession, regardless of whether their criminal history occurred in Australia or internationally.

The RACGP notes that the National Boards would prefer to maintain the status quo, rather than amend or replace the existing Standard, as they are not aware of any issues arising from its application to date.

Whilst the RACGP has no objections to this approach at this stage, the Standard's continued application and the outcomes should be monitored to ensure that it continues to protect the public while affording the registration applicant a fair and transparent assessment.

Further, given the recent review of the existing process for international criminal history checking and the likelihood of a new process being adopted, it would be both timely and beneficial to make new information available to health practitioners and the public about:

- relevant standards
- stakeholder rights and responsibilities
- the overall criminal history assessment process.

English Language Skills Registration Standard

The existing *English Language Registration Standard* stipulates the requirements and forms of evidence that are acceptable as proof that a registration candidate has the appropriate level of English language proficiency required.

The RACGP notes that the National Boards would prefer to adopt a revised *English Language Skills Registration Standard* that incorporates research commissioned by the National Boards, looking at:

- international approaches to English language testing
- historical approaches to English language testing in Australia
- the national boards' three years of practical experience with the existing regulatory framework.

Who it applies to

Unlike the National Medical Board's original Standard, the revised Standard appears to apply to all initial registration applicants, not just those who are internationally qualified, or those who did not undertake or complete their secondary education in English. The RACGP seeks clarification on whether this is what is intended and, if so, what the justification is.

Types of evidence

The RACGP notes that broader types of evidence for English language proficiency (beyond the International English Language Testing System or Occupational English test results) are now accepted. This change recognises the various ways in which internationally qualified applicants have gained and demonstrated their level of English language proficiency during the course of (undisrupted) education, training and clinical practice, undertaken in English.

This may help address the difficulties that some internationally qualified doctors experience when trying to achieve the National Medical Board's registration standard under formal testing conditions – as identified by the House of Representatives Standing Committee on Health and Ageing (2012) inquiry into registration processes and support for overseas trained doctors.

Additional options

The RACGP believes that the additional options for medicine (i.e. the successful completion of the New Zealand Registration Examination or the Professional and Linguistic Assessments Board of the General Medical Council in the United Kingdom) should be retained.

Test results

The question of whether test results from the International English Language Testing System (IELTS) or Overseas English Test (OET) should only be obtained in one sitting, appears to depend on the type of test conducted. Therefore, the requirement may need to vary depending on the test taken as per the recommendations proposed in the discussion paper. It may also be beneficial to investigate the factors contributing to the need for multiple sittings, as this will help address the issue while maintaining the integrity of the assessment process.

Alignment with Department of Immigration and Citizenship

Finally, in relation to the question of whether the standards should be aligned with the Department of Immigration and Citizenship, the RACGP believes that alignment will eliminate past inconsistencies and reduce associated costs and other administrative burdens. However, the College also believes that when aligning the standards, the higher of the two standards should be adopted as the benchmark.

If you have any questions regarding this matter please contact myself or Mr Roald Versteeg, Manager – Policy & Practice Support on [REDACTED]

Yours sincerely

[REDACTED]
A/ Prof Frank Jones
Vice - President