

Q1.

Review of the English Language Skills registration standards

Introduction

The Chinese Medicine, Chiropractic, Dental, Medical, Medical Radiation Practice, Nursing and Midwifery, Occupational Therapy, Optometry, Osteopathy, Paramedicine, Pharmacy, Physiotherapy, Podiatry and Psychology Boards of Australia (National Boards) are participating in the joint review of the English Language Skills registration standards (ELS Standards). To practise safely in Australia, registered health practitioners must have effective English language skills. This includes being able to communicate effectively with patients/clients/consumers and their relatives and carers, collaborate with other health care professionals and keep clear and accurate health records.

The National Boards set requirements for English language skills to make sure all registered health practitioners can provide safe care and communicate effectively in English. The ELS standard helps to ensure that everyone who registers as a health practitioner in Australia has these skills, regardless of their language background. The ELS standard is one of the five core registration standards required by all National Boards and applies to all applicants at initial (first) registration, whether they qualified in Australia or overseas.

The National Boards and the Australian Health Practitioner Regulation Agency (Ahpra) are seeking feedback about the proposed revised ELS Standards. Please ensure you have read the public consultation papers before answering this survey, as the questions are specific to the revised ELS Standards.



Q3. Publication of responses

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Q1. About your responses

Are you responding on behalf of an organisation?

☐ Yes

☒ No

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Q3. Which of the following best describes your organisation?

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Q4. Please describe your organisation.

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Q5. Your contact details

First name:

Mathew

Q6. Last name:

John

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

- ☒ I am a health practitioner
- ☐ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

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Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

- ☐ Aboriginal and Torres Strait Islander Health Practice
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- ☐ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☒ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☐ Other

Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

Ahpra and the National Boards (excluding the Aboriginal and Torres Strait Islander Health Practice Board of Australia) have reviewed their respective ELS standard to ensure that it stays current and keeps pace with our changing and dynamic environment.

We are only proposing changes to the common ELS standards where real improvements have been identified to align with available evidence, clarify processes, reduce duplication, streamline and remove unnecessary

information and address gaps in content. We have based any changes on research and international benchmarking and our regulatory experience.

The main changes proposed to the ELS standard common for all professions (except the NMBA) involved in the review are:

- clearer naming of the pathways in the standard
- renaming the current 'primary pathway' to the 'school pathway' to have a clear differentiation between the pathway and primary education
- strengthening and renaming the extended education pathway
- aligning with the Department of Home Affairs (DoHA) requirements by removing South Africa from the recognised country list
- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
- reorganising content to make the sequence more logical
- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

Yes.It will test the English language skills of the candidates to some extent.UK,New Zealand and Ireland come with new changes in the score because they are not getting enough nurses from overseas

Q14.

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

No

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

Yes clear

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

Yes clear

Q17. 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?

Yes

Q18.

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 standards 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?

Yes

Q19.

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

No

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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 standards?

No

Q21.

Additional questions

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.

Previously once you passed the ELS test you could apply for registration in Australia. Now the entire sequence is changed and it made Australia is the least preferred option for overseas candidates. First we need to apply for NCLEX RN exam which takes at least six months to pass and candidates have to come to Adelaide for practical exam for which long que is a problem because of unavailability of seats. It takes another 6-9 months to clear the practical exam and as a third step candidates have to produce a valid English test when applying for registration and it takes another six months to complete. So in short, the changes made in the last years to improve the overseas nurses produced undesirable outcome and worsens the shortage of nurses which is already worsened after covid hit. The long processing time and complexity of the process resulted in the change in destination from Australia to UK, Ireland and New Zealand where still an accredited English is the only requirement to apply for registration and required score is lesser than in Australia.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

No

Q23.

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

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

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Q24.

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.

No

Q25.

Do you have any other feedback about the ELS standards?

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Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

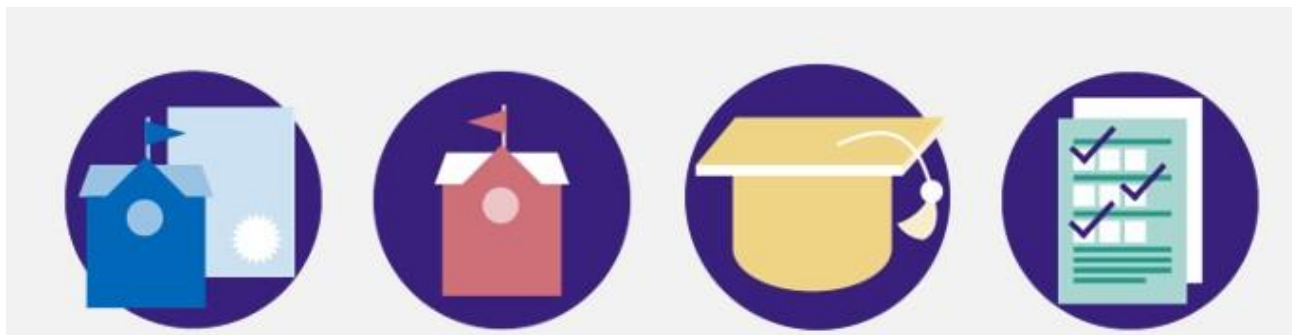
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First name:

Matthew

Q6. Last name:

Emmett

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[REDACTED]

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It is reasonably clear, however, I'd like clarification on whether studying a tertiary degree in Australia prior to advancing to a postgraduate course is a standard by which we can judge someone's English proficiency as sufficient enough to warrant skipping reassessment for English proficiency prior to entering a postgraduate course. I believe this is especially pertinent regarding students who come from countries where English is recognised as an official language, such as South Africa.

Q14.

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

I believe it is worth investigating whether students who are citizens or permanent residents of Australia and have already completed a tertiary degree in this country should be required to sit an English proficiency test on the basis that they've completed their primary and secondary schooling in a country such as South Africa or Singapore, both of which are purported to not reach the revised ELS standards.

Q15.

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

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

They are workable for the most part, but could be clearer.

Q16.

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.

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

I don't believe the new names are particularly helpful in distinguishing one pathway from another.

Q17. 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?

Yes, it would be helpful to have examples as definitions can often be verbose and unclear.

Q18.

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 standards 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?

Yes, this would be less onerous for many participants.

Q19.

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

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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 standards?

Q21.
Additional questions

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.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

I think in the case of removing South Africa from the accepted standards that many perfectly capable English speakers are now being unfairly subjected to the onerous and anxiety-provoking task of sitting tests in a language they already have proven proficiency in. This seems a bit unfair.

Q23.
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

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

Q24.
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.

Q25.
Do you have any other feedback about the ELS standards?

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Thank you!

Thank you for participating in the public consultation.

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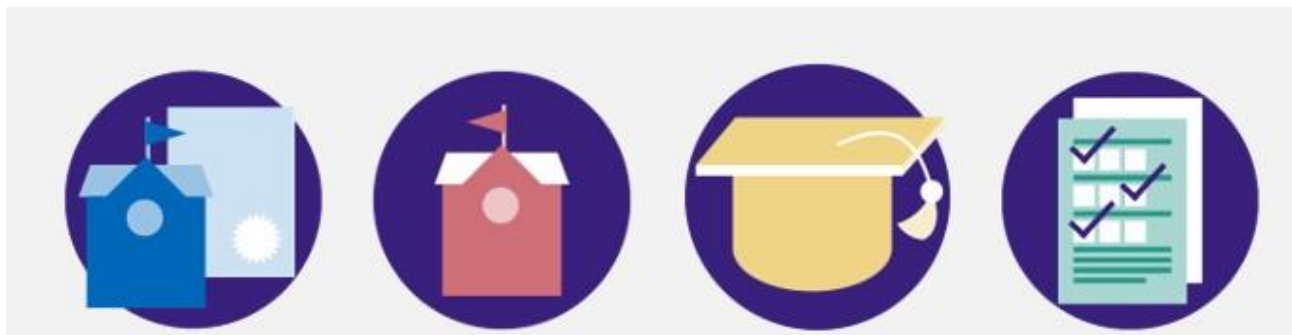
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Q5. Your contact details

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Mujahid

Q6. Last name:

Hussain

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Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

Yes it is clear and workable however there is confusion if a student had a gap in study even though more than 5 years study has been completed in an English language country.

Q14.

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

I believe three years of study in an English language country in an English language should be enough instead of 5 years, either continuous three years and/or as long as the course is composed of one or two courses that constitutes three years of study.

Q15.

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 standards
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- minor rewording

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2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

I think all of the above four proposed pathways are fairer and clear to understand.

Q17. 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?

It is always helpful for people and get their answers straightaway in the website.

Q18.

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 standards 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?

I believe 12 months would be a great idea for students who finalising their studies and/or working commitments. It would give more time to prepare and organise the test as some times dates for tests are not easy to get in upcoming months due to high demand e.g PTE.

Q19.

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

English language test should not have an expiry date or at least expires not less than 10 years. As a matter of fact, the more you stay and speak an English language in an English language country , your language skills gets better and eventually becomes like a native speaker. It is my personal experience and my personal observation. thanks

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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 standards?

English language competency can be determine by the employer. For example, A nurse can be assessed by the Nursing Educator or the ward manager to look after a patient, communicating in English language with a real patient in a clinical setting. This would allow the Manager whether the nurse is competent enough to offer health care and satisfy patient's needs.

Q21.

Additional questions

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.

It would only take 15-30 minutes of a Manager or Nursing Educator to assess nursing graduates or other health professional graduates to determine whether he or she needs more English language training or testing.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

There would not be any negative effects however it can be started as a trial.

Q23.

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

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

N/A

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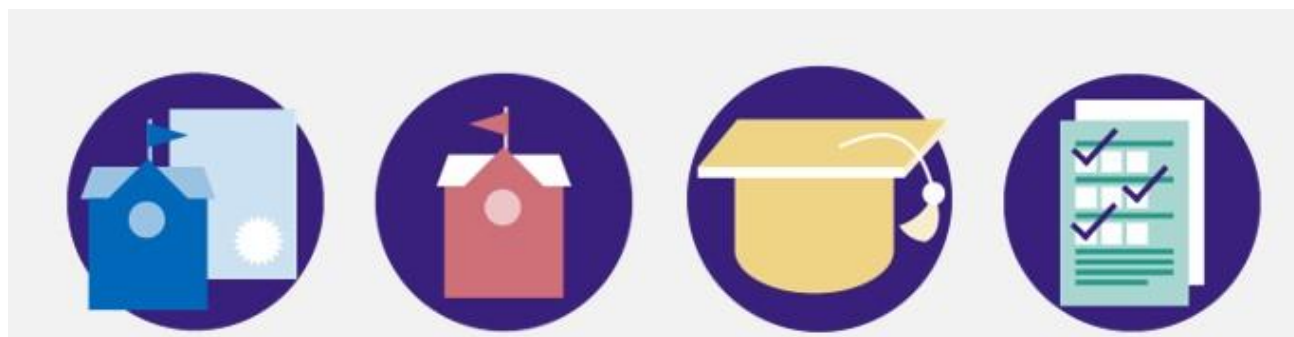
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The Chinese Medicine, Chiropractic, Dental, Medical, Medical Radiation Practice, Nursing and Midwifery, Occupational Therapy, Optometry, Osteopathy, Paramedicine, Pharmacy, Physiotherapy, Podiatry and Psychology Boards of Australia (National Boards) are participating in the joint review of the English Language Skills registration standards (ELS Standards). To practise safely in Australia, registered health practitioners must have effective English language skills. This includes being able to communicate effectively with patients/clients/consumers and their relatives and carers, collaborate with other health care professionals and keep clear and accurate health records.

The National Boards set requirements for English language skills to make sure all registered health practitioners can provide safe care and communicate effectively in English. The ELS standard helps to ensure that everyone who registers as a health practitioner in Australia has these skills, regardless of their language background. The ELS standard is one of the five core registration standards required by all National Boards and applies to all applicants at initial (first) registration, whether they qualified in Australia or overseas.

The National Boards and the Australian Health Practitioner Regulation Agency (Ahpra) are seeking feedback about the proposed revised ELS Standards. Please ensure you have read the public consultation papers before answering this survey, as the questions are specific to the revised ELS Standards.



Q3. Publication of responses

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Please select the box below if you do **not** want your responses to be published.

☐ Please do **not** publish my responses

Q1. About your responses

Are you responding on behalf of an organisation?

☐ Yes

☒ No

Q2. Please provide the name of the organisation.

This question was not displayed to the respondent.

Q3. Which of the following best describes your organisation?

This question was not displayed to the respondent.

Q4. Please describe your organisation.

This question was not displayed to the respondent.

Q5. Your contact details

First name:

Mulham

Q6. Last name:

Daas

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

- ☒ I am a health practitioner
- ☐ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

This question was not displayed to the respondent.

Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

- ☐ Aboriginal and Torres Strait Islander Health Practice
- ☐ Chinese Medicine
- ☐ Chiropractic
- ☐ Dental
- ☒ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☐ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☐ Other

Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

Ahpra and the National Boards (excluding the Aboriginal and Torres Strait Islander Health Practice Board of Australia) have reviewed their respective ELS standard to ensure that it stays current and keeps pace with our changing and dynamic environment.

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information and address gaps in content. We have based any changes on research and international benchmarking and our regulatory experience.

The main changes proposed to the ELS standard common for all professions (except the NMBA) involved in the review are:

- clearer naming of the pathways in the standard
- renaming the current 'primary pathway' to the 'school pathway' to have a clear differentiation between the pathway and primary education
- strengthening and renaming the extended education pathway
- aligning with the Department of Home Affairs (DoHA) requirements by removing South Africa from the recognised country list
- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
- reorganising content to make the sequence more logical
- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

clear but technical for a layman

Q14.

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

see below

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

yes

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

yes

Q17. 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?

yes

Q18.

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 standards 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 12 months timeframe makes it easier for applicants to meet the standards. this is appropriate.

Q19.

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

It is noted that the changes proposed are only "cosmetic" not substantial. When I take IELTS for example I get 7 and 8 scores but that is unnecessary for a Dr. Score 6.5 is more than enough for Drs to work well in Australia. This can add a few hundreds more Drs to the work force here which is badly needed. The extremely high standard is keeping those Drs from working in Australia which is a pity. On the other hand, I noticed that some Drs who come from southeast asia speak and write with very broken English which cant be equal to more than 5 score on IELTS. They most probably are exempted from taking an exam due to studying in English in high school. This pathway should be stopped. No exemption for studying high school in English should be kept available but the IELTS (and equivalent) scores should be dropped to 6.5 and not kept at level 7.

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

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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 standards?

no

Q21.

Additional questions

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.

this has no impact

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

the changes are only cosmetic...

Q23.

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

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

I am not sure

Q24.

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.

I cant tell

Q25.

Do you have any other feedback about the ELS standards?

As above

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

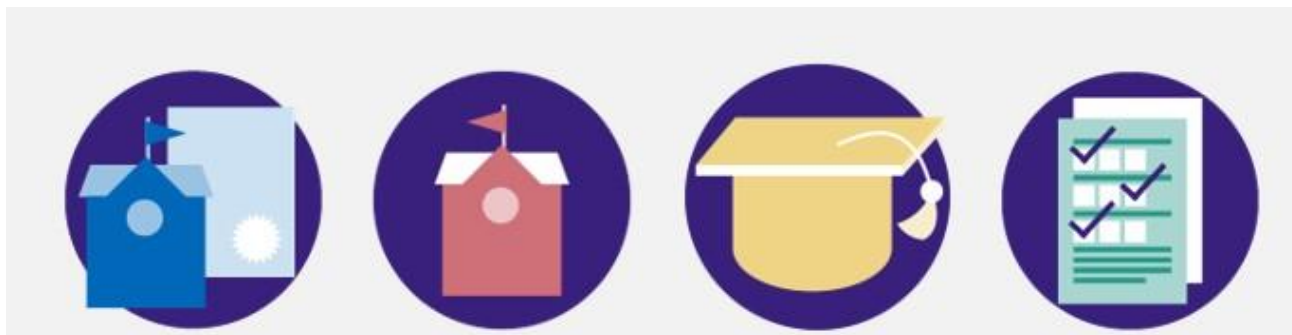
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Mustafa

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BHAVNAGARWALA

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[REDACTED]

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Q19.

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

Should reduce the band score of 7 in each module to band 6 and overall band to 6.

Q20.

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

Q24.
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.

Q25.
Do you have any other feedback about the ELS standards?

Q26.
Thank you!

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Q1.

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Q5.

Your contact details

First name:

Q6. Last name:

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Q8.

Which of the following best describes you?

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- ☒ Other

Q9. Please describe.

Finish my nursing

Q10.

Which of the following health profession/s are you registered in, in Australia?
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Does not clear

Q14.

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

The English test is becoming a business they just making you money over and over

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

It's not because it all becoming a business and and they failing people for them to come back over and over it so stressful I have finished my nursing degree 1 year ago and still can't get it.

Q16.

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.

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Yes

Q17. 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?

Yes

Q18.

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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?

Yes

Q19.

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

Make It easy for people that have done their education in Australia to get their English test because we have studied the Australian English so why make it hard for people to pass their English test and the test is so expensive people are making money out of it making it a business now and also life expenses is so hard I have studied so hard thinking after completing my course I'll have a better job to help take care of my family but not I have to pay again and again on the English test I just feeling like giving up because I can't afford it.

Q20.

Additional English language test types or modalities

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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 standards?

Yes if you have completed your nursing degree in Australia it shouldn't be so hard to get your English exam or people that comes from a English speaking country should be allowed to use it or give you credit because of studying in Australia.

Q21.

Additional questions

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 because the English test is so expensive and it not really affordable if you finished studying your nursing degree in Australia and you have to pay 10th off thousands and after that pay all that money for a test that you will never pass because they say so.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

No it would be great to change the whole system.

Q23.

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

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

No it would rather help them because we'll have more nurses that will be able to care for them.

Q24.

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.

No it would rather help them because we'll have more nurses that will be able to care for them.

Q25.

Do you have any other feedback about the ELS standards?

I have commented all my feedback in the survey please check and consider them thank you.

Q26.

Thank you!

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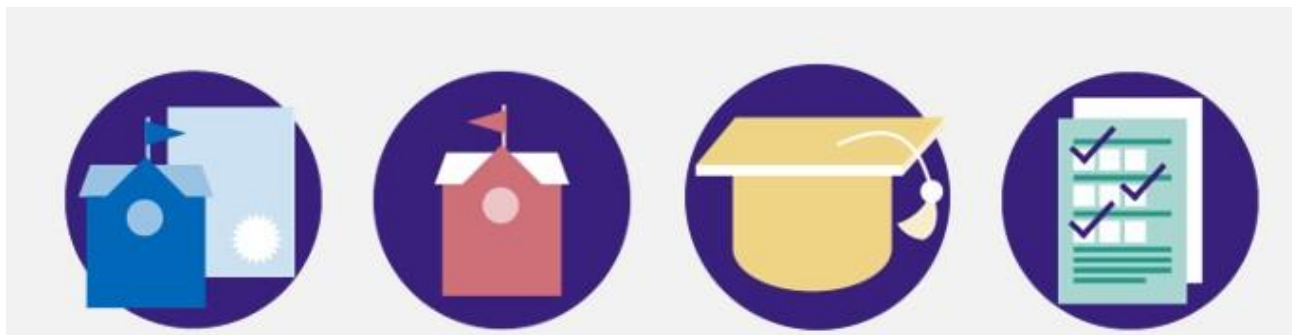
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- ☐ Podiatry
- ☒ Psychology
- ☐ Other

Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

Ahpra and the National Boards (excluding the Aboriginal and Torres Strait Islander Health Practice Board of Australia) have reviewed their respective ELS standard to ensure that it stays current and keeps pace with our changing and dynamic environment.

We are only proposing changes to the common ELS standards where real improvements have been identified to align with available evidence, clarify processes, reduce duplication, streamline and remove unnecessary

information and address gaps in content. We have based any changes on research and international benchmarking and our regulatory experience.

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- clearer naming of the pathways in the standard
- renaming the current 'primary pathway' to the 'school pathway' to have a clear differentiation between the pathway and primary education
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- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
- reorganising content to make the sequence more logical
- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

yes, clear pathways, adding more English tests and a clear differentiation between pathways will improve the registration process

Q14.

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

yes, Taking into consideration part time studies, volunteering roles and time living in Australia. A clear example is the Psychology pathway where part time studies are not considered. Would be great to give mothers the chance to fulfill their careers while they have their babies, respect their decisions to study part-time and be involve in their child development.

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

In my opinion those statements are still unclear and confusing. More information with explanations about decisions (theory-statement behind the decisions) would be an advantage for applicants, as at the moment those norms and rules are discriminatory, sexist and racist.

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

I would love to have more information about this pathways, as if they are just changing the names of the pathways, it wont have any impact on futures applicants. Would be great to expand those pathways incorporating part-time studies, university studies in Australia (part-time instead of just full time) even when high-school was completed overseas. Check accuracy of English tests please!!! I would love to see the whole AHPRA board take the English tests (that they mandate) so they can have a better insight of the testing system and if they can all obtain the scores that they command. Lastly, please make sure that all the officers are aware of the pathways, the regulations and the whole process for international students seeking registration in AU, and for citizens applying through the different pathways.

Q17. 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?

YES - Clear explanations and definitions will make application easier

Q18.

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 standards 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?

yes. specially after COVID. Many test were cancel last year. Also this will relieve some of the stress and deterioration of the health that those tests cause on people.

Q19.

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

Everything!!!! Would be better if the board talk to real people, real applicants and explore the different experiences that we all had with AHPRA and their strict rules! I would love to see AHPRA taking applicants as humans and individuals, validating their experiences in life and as professional. Getting references (or even reference letters from managers as an example) as method to explore applicant's skills and values on the profession. Everything can't be so objective!

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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 standards?

Yes, modality is a great change as during COVID English test - home versions- were not accepted by AHPRA. In unprecedented times like we are living right now, being able to do a test from home will save waiting time for applicants. Especially the ones that they visa status, due to AHPRA application, depends on an English test.

Q21.

Additional questions

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.

I strongly believe if changes are made to improve applicant's pathways , Our Health system will improve, providing a more accessible and better care for clients.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

no

Q23.

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

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

no

Q24.

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.

no

Q25.

Do you have any other feedback about the ELS standards?

Please revise all the English tests and check for yourself how inaccurate those can be. Those tests don't work for everyone and they don't represent a person's level of English.

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

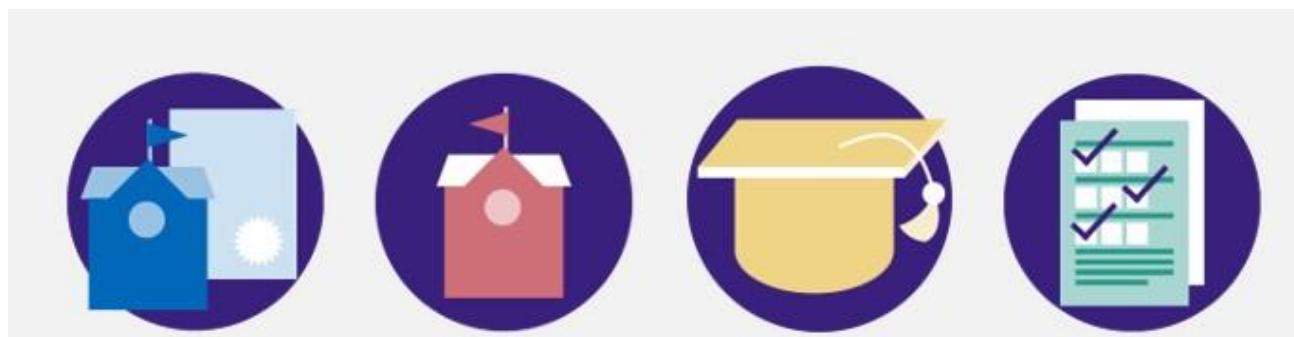
Review of the English Language Skills registration standards

Introduction

The Chinese Medicine, Chiropractic, Dental, Medical, Medical Radiation Practice, Nursing and Midwifery, Occupational Therapy, Optometry, Osteopathy, Paramedicine, Pharmacy, Physiotherapy, Podiatry and Psychology Boards of Australia (National Boards) are participating in the joint review of the English Language Skills registration standards (ELS Standards). To practise safely in Australia, registered health practitioners must have effective English language skills. This includes being able to communicate effectively with patients/clients/consumers and their relatives and carers, collaborate with other health care professionals and keep clear and accurate health records.

The National Boards set requirements for English language skills to make sure all registered health practitioners can provide safe care and communicate effectively in English. The ELS standard helps to ensure that everyone who registers as a health practitioner in Australia has these skills, regardless of their language background. The ELS standard is one of the five core registration standards required by all National Boards and applies to all applicants at initial (first) registration, whether they qualified in Australia or overseas.

The National Boards and the Australian Health Practitioner Regulation Agency (Ahpra) are seeking feedback about the proposed revised ELS Standards. Please ensure you have read the public consultation papers before answering this survey, as the questions are specific to the revised ELS Standards.



Q3. Publication of responses

The National Boards and Ahpra publish submissions at their discretion. We generally publish submissions on our websites to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our websites, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

The National Boards and Ahpra can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

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

Please select the box below if you do **not** want your responses to be published.

☐ Please do **not** publish my responses

Q1. About your responses

Are you responding on behalf of an organisation?

☐ Yes

☒ No

Q2. Please provide the name of the organisation.

This question was not displayed to the respondent.

Q3. Which of the following best describes your organisation?

This question was not displayed to the respondent.

Q4. Please describe your organisation.

This question was not displayed to the respondent.

Q5.

Your contact details

First name:

Q6. Last name:

Q7. Email address:

Q8.

Which of the following best describes you?

- ☒ I am a health practitioner
- ☐ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

This question was not displayed to the respondent.

Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

- ☐ Aboriginal and Torres Strait Islander Health Practice
- ☐ Chinese Medicine
- ☐ Chiropractic
- ☐ Dental
- ☐ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☐ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☒ Other

Q11. Please describe.

Remedial massage therapist

Q12.

General

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- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
- reorganising content to make the sequence more logical
- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

No its not

Q14.

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

The requirements are to high and need to be lowered.

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

All of the language requirements are not logical nor are they practical and by far to high in either academic and general tests

Q16.

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:

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

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

Sure

Q17. 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?

Q18.

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 standards 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?

No enough time

Q19.

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

The board needs to consider people with learning difficulties more. People that come from overseas like me trying their absolute best to get accredited in their profession are struggling. This English test has ruined my first 3 years when I came to Australia. I was like a lot of people a victim of English tutor scams and an enormous amount of failed tests. Even registered Testcenters of IELTS , PET'S, and OET'S took advantage of people like me. years ago I started to go to meetings of people that fell victim to a clear MONEYGRAB system that is clearly not designed to have you pass but to have you fail first. Stuff that was taught in the first 10 sessions for most of the tests, out of a sudden changed because "apparently the new teachings would get me my desired scores even better" ...well why wasn't that taught from minute one???. I am furious with the entire system and the way it's been handled. I have written countless emails and letters to the board, to politicians, to associations, even to Mr.Mark McGowan himself to make everyone aware of this scam. I've wasted ten's of thousands of Dollars only to be told from most of the tutors and assessors that they can't understand why I wouldn't pass the tests. I am a studied Physio therapist from Germany who eventually had to give in because he didn't had any money to fund his passion and had to give in and get his Remedial qualification just so he can still work I'm some of his field. This English test system has caused me intense mental health issues and I had to make a lot of sacrifices to stay in this country. I was waiting for something like this to come around to tell my end of the story and finally have someone listen. You want to change something? stop destroying people's life's by a useless inapplicable English test that puts people in a spiral...neither the IELTS nor the PET have anything to do with testing people's English skills, not one bit, even the OET which is supposed to be more in tune with your profession is absolutely useless and in other ways way to hard. How does describing of a pie chart or a graph about wheat tell you anything about my English skills??? I fear that even this message won't change anything to be honest. People like me that have a bit of dyslexia get no help what so ever...you think giving people with dyslexia 5 min more for a reading or writing test will change anything? No it doesn't, it changes absolutely nothing. I was told by the AHPRA association that my English skills and my qualifications from Germany are not up to Australian standard, yet I had about 6 Physio clinics that wanted me so badly and desperately, they tried everything they could to get me in because my skill level was exceptional and by far better then most of the Australian physios. I can only hope someone will read this and hear my voice and I pray that many more will come forward and tell their end of the story.

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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Change the point system Make it easier for people. Give people with learning difficulties or dyslexia a lower point score to achieve. Make the test more applicable and stop making people write about nonsense pie charts or graphs or any of the matter, it will never give you a accurate indication of the English skill level they actually possess...

Q21.

Additional questions

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.

No it wouldn't...

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

Q23.

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

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

Q24.

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.

Q25.

Do you have any other feedback about the ELS standards?

The board needs to consider people with learning difficulties more. People that come from overseas like me trying their absolute best to get accredited in their profession are struggling. This English test has ruined my first 3 years when I came to Australia. I was like a lot of people a victim of English tutor scams and an enormous amount of failed tests. Even registered Testcenters of IELTS , PET'S, and OET'S took advantage of people like me. years ago I started to go to meetings of people that fell victim to a clear MONEYGRAB system that is clearly not designed to have you pass but to have you fail first. Stuff that was taught in the first 10 sessions for most of the tests, out of a sudden changed because "apparently the new teachings would get me my desired scores even better" ...well why wasn't that taught from minute one???. I am furious with the entire system and the way it's been handled. I have written countless emails and letters to the board, to politicians, to associations, even to Mr.Mark McGowan himself to make everyone aware of this scam. I've wasted ten's of thousands of Dollars only to be told from most of the tutors and assessors that they can't understand why I wouldn't pass the tests. I am a studied Physio therapist from Germany who eventually had to give in because he didn't had any money to fund his passion and had to give in and get his Remedial qualification just so he can still work I'm some of his field. This English test system has caused me intense mental health issues and I had to make a lot of sacrifices to stay in this country. I was waiting for something like this to come around to tell my end of the story and finally have someone listen. You want to change something? stop destroying people's life's by a useless inapplicable English test that puts people in a spiral...neither the IELTS nor the PET have anything to do with testing people's English skills, not one bit, even the OET which is supposed to be more in tune with your profession is absolutely useless and in other ways way to hard. How does describing of a pie chart or a graph about wheat tell you anything about my English skills??? I fear that even this message won't change anything to be honest. People like me that have a bit of dyslexia get no help what so ever...you think giving people with dyslexia 5 min more for a reading or writing test will change anything? No it doesn't, it changes absolutely nothing. I was told by the AHPRA association that my English skills and my qualifications from Germany are not up to Australian standard, yet I had about 6 Physio clinics that wanted me so badly and desperately, they tried everything they could to get me in because my skill level was exceptional and by far better then most of the Australian physios. I can only hope someone will read this and hear my voice and I pray that many more will come forward and tell their end of the story

Q26.

Thank you!

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Q1.

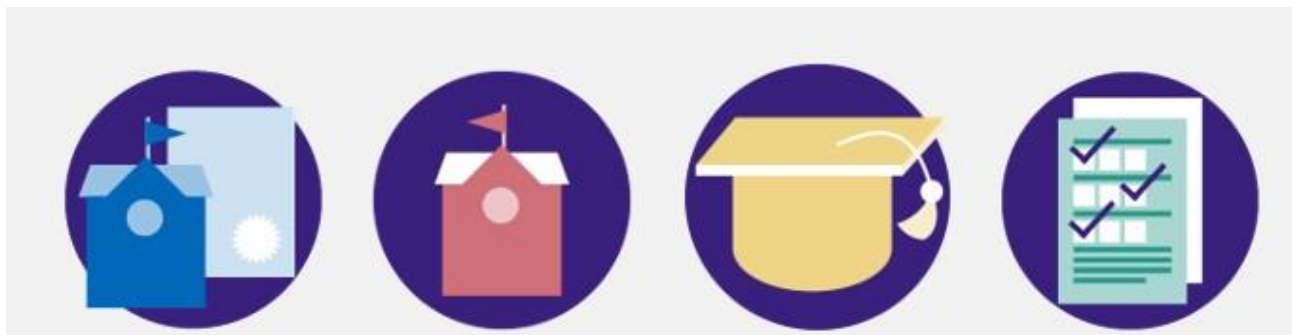
Review of the English Language Skills registration standards

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☐ Please do **not** publish my responses

Q1. About your responses

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☐ Yes

☒ No

Q2. Please provide the name of the organisation.

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Q3. Which of the following best describes your organisation?

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Q4. Please describe your organisation.

This question was not displayed to the respondent.

Q5. Your contact details

First name:

Q6. Last name:

Q7. Email address:

Q8.

Which of the following best describes you?

- ☐ I am a health practitioner
- ☒ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

This question was not displayed to the respondent.

Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

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Q11. Please describe.

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Q12.

General

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Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

I don't know why we have to prove our language at every stage, why AHPra don't consider the work experience or launch other platforms to prove our language skills, I mean as a student I studied at Latrobe university for 2 years but because I haven't paid the fees so I can't prove that I have attended uni and studied and assessed in English in Australia. I would have been a three months ago if I don't have to prepare for English test.

Q14.

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

I think for the language the work experience should be counted .

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

They r not too clear although once we follow them then we get through this .

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

Yes

Q17. 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?

Yes having more idea for students

Q18.

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 standards 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?

Yes as there are too many people rush at the same time. Which can surely becomes hard for students to keep up with

Q19.

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

I think making it more straightforward or launching your own test would benefit highly.

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

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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 standards?

I think it's pretty good at this stage .

Q21.

Additional questions

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.

No

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

I think easy process and available just makes it easier I don't see any negative effects of ELS changes

Q23.

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

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

Not sure

Q24.

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.

No

Q25.

Do you have any other feedback about the ELS standards?

No

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

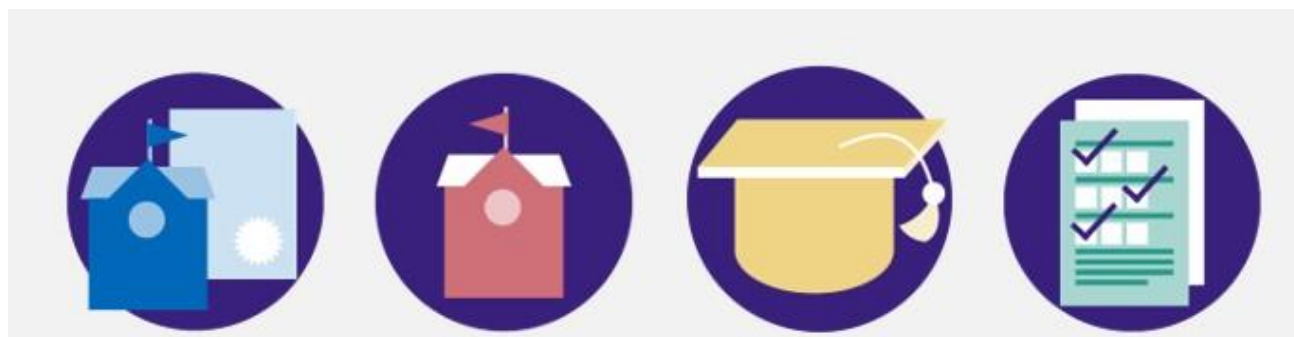
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The National Boards set requirements for English language skills to make sure all registered health practitioners can provide safe care and communicate effectively in English. The ELS standard helps to ensure that everyone who registers as a health practitioner in Australia has these skills, regardless of their language background. The ELS standard is one of the five core registration standards required by all National Boards and applies to all applicants at initial (first) registration, whether they qualified in Australia or overseas.

The National Boards and the Australian Health Practitioner Regulation Agency (Ahpra) are seeking feedback about the proposed revised ELS Standards. Please ensure you have read the public consultation papers before answering this survey, as the questions are specific to the revised ELS Standards.



Q3. Publication of responses

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Which of the following best describes you?

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- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

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Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

- ☐ Aboriginal and Torres Strait Islander Health Practice
- ☐ Chinese Medicine
- ☐ Chiropractic
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- ☐ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☒ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☐ Other

Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

Ahpra and the National Boards (excluding the Aboriginal and Torres Strait Islander Health Practice Board of Australia) have reviewed their respective ELS standard to ensure that it stays current and keeps pace with our changing and dynamic environment.

We are only proposing changes to the common ELS standards where real improvements have been identified to align with available evidence, clarify processes, reduce duplication, streamline and remove unnecessary

information and address gaps in content. We have based any changes on research and international benchmarking and our regulatory experience.

The main changes proposed to the ELS standard common for all professions (except the NMBA) involved in the review are:

- clearer naming of the pathways in the standard
- renaming the current 'primary pathway' to the 'school pathway' to have a clear differentiation between the pathway and primary education
- strengthening and renaming the extended education pathway
- aligning with the Department of Home Affairs (DoHA) requirements by removing South Africa from the recognised country list
- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
- reorganising content to make the sequence more logical
- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

Yes

Q14.

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

Would like to see removal of all pathways except test pathway and raising of the standard required. Many practicing nurses have an inadequate level of English and testing everyone is the only way to resolve this

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

Pathways are clear but only the test pathway guarantees a minimum level of English in speaking, reading, and writing

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

These are clear

Q17. 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?

Yes. Examples of different potential circumstances and what pathway they would take would make it clear.

Q18.

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 standards 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?

No, people can take many many tests in a 12 month period and combine the best 2 results to get a pass. Applicants should be able to meet the standard easily without needing to combine results. Suggest narrowing this window to less than 6 months or removing the option to combine results entirely

Q19.

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

Would like to see all applicants take the test pathway and for this to be the only option. Even native speakers may have a poor level of written English

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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 standards?

Q21.

Additional questions

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.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

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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

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

Q24.

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.

Q25.

Do you have any other feedback about the ELS standards?

The test pathway is the only objective way to measure English language skills. Making all applicants take this test would improve standards across the profession

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

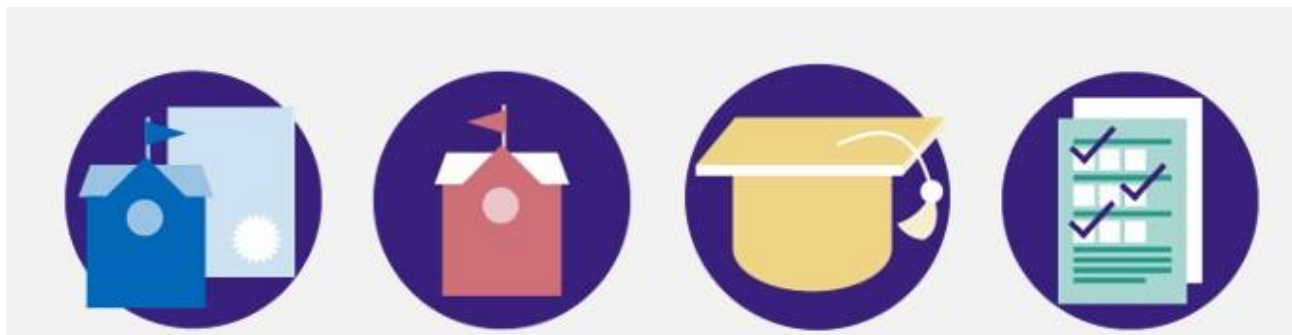
Review of the English Language Skills registration standards

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- ☐ Podiatry
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- ☐ Other

Q11. Please describe.

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General

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The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

No. Scrap all requirements for any country where the health course was in English. If they can pass Australian exams and interviews, their English is good enough.

Q14.

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

Remove any ELS for people coming from countries where the educational system is in English. Your registration exams are in English right? So what's the point of an ELS? If their English is good enough for the exam, it is good enough for practice.

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

as already stated, it is clear but not workable. There should be no standard,. The registration exams are themselves a test of English.

Q16.

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.

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4. Test pathway (no change to current pathway name)

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

they are helpful and clear. Simple.

Q17. 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?

No. Makes it too ambiguous. English language standards can be compressed into one summary: Your English should be good enough for OUR registration exams and interviews.

Q18.

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 standards 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?

Not only wrong, it is unnecessary. I did min 3 times cos it kept elapsing, taking time I should have dedicated to becoming a better Doctor. Do you think they suddenly develop dementia and forget their English? Scrap the ELS or have one exam and if they pass it stays valid for life. we are throwing money at IELTS and some come from very poor families.

Q19.

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

make life easy fr every body: either accept one valid IELTS pass for life or scrap the ELS completely cos the rego exams are in English and no one with poor English can pass them anyway.

Q20.

Additional English language test types or modalities

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are you serious? first we have to click endless buttons to get to the survey then you have to rephrase questions 100 ways??? is this an IQ test or a survey?

Q21.

Additional questions

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. we waste money on IELTS, and time preparing for English exams instead of the registration exam for the field .

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

yes. IMGs will have one more layer of unnecessary stress. scrap this unnecessary ELS for countries who study in English

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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

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

no. registration exams are in English. that is enough.

Q24.

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.

no.

Q25.

Do you have any other feedback about the ELS standards?

yes. scrap any ELS for people who study in English, or accept a pass score in belts for life with no expiry date.

Q26.

Thank you!

Thank you for participating in the public consultation.

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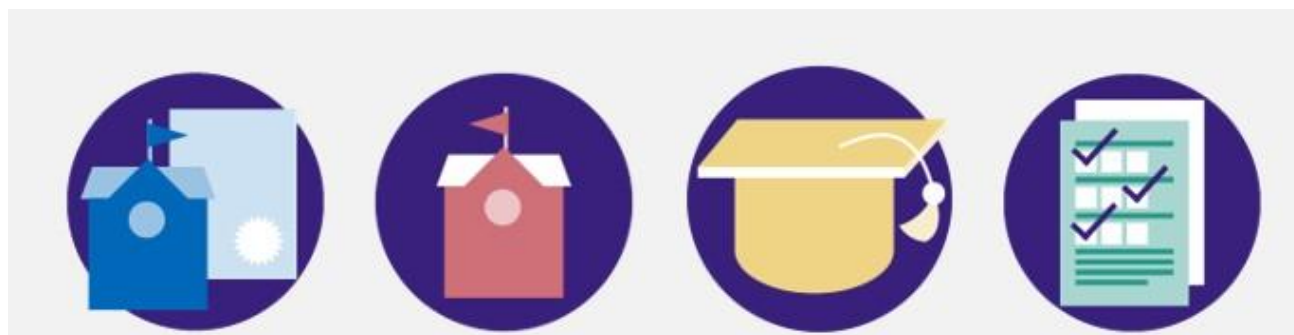
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Overseas Physiotherapist

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It is workable but if a candidate scored desired overall score but failed in a single component, please allow them to register their application as it will cost a lot of money in each exam.

Q14.

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

If a candidate scored desired overall score but failed in a single component, please allow them to register their application as it will cost a lot of money in each exam. For example, I have given IELTS twice. In my first attempt I got overall band 7 (L-7.5, R-6.5, W-6.5, S-6.5) and in 2nd attempt I scored again overall band 7 (L-7.5, R-8, W-6, S-7). Only because of writing module I have to give the exam again and it will cost a lot as the exam is really costly. I think AHPRA should accept 6.5 band in a single module so that the money of the candidate do not get waste.

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Yes, they are clear

Q17. 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?

Yes, as it will provide better understanding to applicants what is actually required.

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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?

It is better. Along with this my actual concern should be acknowledged i.e. If a candidate scored desired overall score but failed in a single component, please allow them to register their application as it will cost a lot of money in each exam. For example, I have given IELTS twice. In my first attempt I got overall band 7 (L-7.5, R-6.5, W-6.5, S-6.5) and in 2nd attempt I scored again overall band 7 (L-7.5, R-8, W-6, S-7). Only because of writing module I have to give the exam again and it will cost a lot as the exam is really costly. I think AHPRA should accept 6.5 band in a single module so that the money of the candidate do not get waste.

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No, it will only benefit the candidate.

Q23.

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

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

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Q25.

Do you have any other feedback about the ELS standards?

If a candidate scored desired overall score but failed in a single component, please allow them to register their application as it will cost a lot of money in each exam. For example, I have given IELTS twice. In my first attempt I got overall band 7 (L-7.5, R-6.5, W-6.5, S-6.5) and in 2nd attempt I scored again overall band 7 (L-7.5, R-8, W-6, S-7). Only because of writing module I have to give the exam again and it will cost a lot as the exam is really costly. I think AHPRA should accept 6.5 band in a single module so that the money of the candidate do not get waste.

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

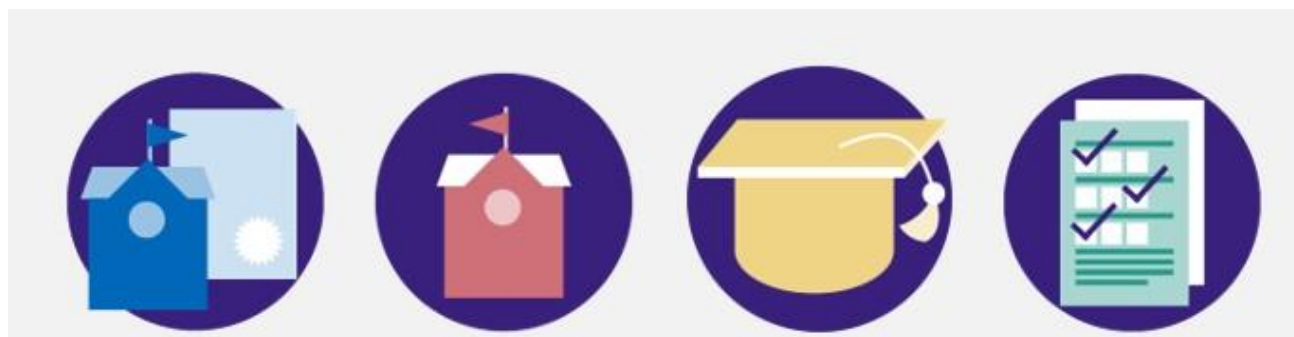
Review of the English Language Skills registration standards

Introduction

The Chinese Medicine, Chiropractic, Dental, Medical, Medical Radiation Practice, Nursing and Midwifery, Occupational Therapy, Optometry, Osteopathy, Paramedicine, Pharmacy, Physiotherapy, Podiatry and Psychology Boards of Australia (National Boards) are participating in the joint review of the English Language Skills registration standards (ELS Standards). To practise safely in Australia, registered health practitioners must have effective English language skills. This includes being able to communicate effectively with patients/clients/consumers and their relatives and carers, collaborate with other health care professionals and keep clear and accurate health records.

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Q3. Which of the following best describes your organisation?

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Q4. Please describe your organisation.

This question was not displayed to the respondent.

Q5. Your contact details

First name:

Patricia

Q6. Last name:

Cosgrave

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

- ☐ I am a health practitioner
- ☒ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

This question was not displayed to the respondent.

Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

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Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

Ahpra and the National Boards (excluding the Aboriginal and Torres Strait Islander Health Practice Board of Australia) have reviewed their respective ELS standard to ensure that it stays current and keeps pace with our changing and dynamic environment.

We are only proposing changes to the common ELS standards where real improvements have been identified to align with available evidence, clarify processes, reduce duplication, streamline and remove unnecessary information and address gaps in content. We have based any changes on research and international benchmarking and our regulatory experience.

The main changes proposed to the ELS standard common for all professions (except the NMBA) involved in the review are:

- clearer naming of the pathways in the standard
- renaming the current 'primary pathway' to the 'school pathway' to have a clear differentiation between the pathway and primary education
- strengthening and renaming the extended education pathway
- aligning with the Department of Home Affairs (DoHA) requirements by removing South Africa from the recognised country list
- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
- reorganising content to make the sequence more logical
- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

Clear, Yes. Relevant, predominantly. Workable, yes. Equitable, No. The test pathway holds certain candidates to a higher expectation than others. It is well documented that many native English speakers cannot obtain a 65 score in the PTE even with multiple attempts, yet their standard is taken as a given based on primary education. Why are you not applying the same standard to all applicants?

Q14.

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

Yes. Test pathway score need to reflect the average native speaker's ability to pass these tests. A review of 100 randomly selected native speaking nurses 1st attempt test scores needs to be carried out to determine an equitable test score expectation.

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

I believe the test pathway needs review, or the extended education pathway needs to be scrapped. The observable outcome shows many graduate nurses that have not had to prove their standard are able to pass unchecked via the extended education pathway. Similarly, the level of literacy of native speakers indicates many could not attain the requisite scores expected of non-native speakers.

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

They are not clear without an explanation.

Q17. 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?

Yes it is helpful. Please consider how you define 'continuous' education. A gap of less than a year (i.e. one semester) is a reasonable amount of time to NOT count as a break in continuity, particularly where one course finishes at the end of Semester 1 in one year and the next doesn't start till Semester 1 the following year.

Q18.

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 standards 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?

Consider 18 months. consider the high cost of testing on low socio-economic culturally and linguistically diverse students. The cheapest test costs roughly \$400 dollars. This can take months to save up – even taking 1 (re)test a month is an extreme burden, particularly on recent graduates who are working minimum wage jobs because they can't get registered in the field they just finished studying in. Bear in mind native speakers rarely pass this first time, and people who have spoken English all their lives (most Scandinavians, Jamaicans, Liberians, Kenyans, Nigerians etc etc) take this test commonly half a dozen times or more.

Q19.

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

Consider: consulting with test companies to determine the required test score is like giving the monkeys the keys to the zoo. Multiple testing at upwards of \$400 each time is hugely profitable for them. Consider: Why countries that do not have a second language and are taught under British school curriculum, like Jamaica for example, are not included in the list of recognised countries. South Africa, Kenya, OK - they have many native languages, but Jamaica? Consider perhaps a secondary list, where the extended education pathway is reduced for people who's entire schooling, television, government etc is in english. The ELS standard needs more nuance, OR it needs an option for review based on supporting documentation. You're marginalising a small cohort of super competent people, and you could better address that somehow. Consider: a review mechanism for people that cannot pass these tests that are marked by artificial intelligence, but have a wealth of supporting evidence from the Australian Public Health Sector/hospital colleagues, clinical placement reports etc. There are people who consistently fail these test, slow readers for example, but are outstanding nurses, and they're being broken down by this process. They have no voice and you have no avenue for them to even discuss, let alone advocate for themselves. It doesn't have to be that black and white.

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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 standards?

Yes. Consider slow readers. Why is pace even a metric? What relevance does it have. Consider 'Academic' level test requirements. These tests particularly the PTE, ask really specific questions on academic topics that short of studying that field are often so ambiguous as to be punitive. Isn't 'conversational' enough? Why 'academic'?

Q21.

Additional questions

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 ESL test pathway is already extraordinarily burdensome for recent graduates that are non-native speakers. I defy anyone to be able to spend \$400 a month on tests to sit these tests the average number of times it takes someone to pass these tests.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

Q23.
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

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

Required scores for testing pathway need review, with downward mobility.

Q24.
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.

Q25.
Do you have any other feedback about the ELS standards?

Q26.
Thank you!

Thank you for participating in the public consultation.

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Q1.

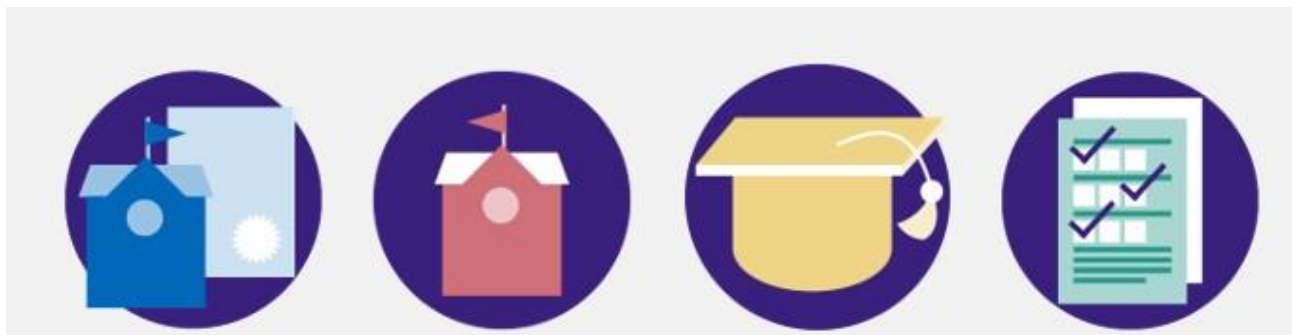
Review of the English Language Skills registration standards

Introduction

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☒ No

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Q4. Please describe your organisation.

This question was not displayed to the respondent.

Q5. Your contact details

First name:

Paul

Q6. Last name:

Allcock

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

- ☒ I am a health practitioner
- ☐ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

This question was not displayed to the respondent.

Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

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- ☐ Chiropractic
- ☐ Dental
- ☒ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☐ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☐ Other

Q11. Please describe.

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Q12.

General

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Yes

Q14.

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

Yes - see later comments regarding IELTS acceptable standards.

Q15.

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

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

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

Yes

Q17. 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?

I don't think it matters.

Q18.

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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?

I would suggest that if a practitioner cannot achieve the required standard in one sitting then their standard of English is not safe and it should not be permitted to combine results from 2 sittings. By all means, an applicant should be able to sit a second time in whatever time period is needed to improve their English and achieve the required standard overall and for each part at that sitting.

Q19.

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

The standard at IELTS of 7.0 (and even 6.5 under certain circumstances for one component) is, I think too low and 7.5 would be better. This opinion comes from experience of supervising practitioners whose English was not of the required standard for medical practice despite achieving 7.5 and also from colleagues involved in recruiting nursing staff internationally. I have sat the IELTS myself, despite being a native speaker, due to the vague wording of the requirements by the state boards at the time I migrated from the UK.

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

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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 standards?

I am sure the boards are aware of the potential for cheating if these tests are done online from home. They should satisfy themselves that robust arrangements are present to prevent this, similar to those used for online postgraduate medical exams.

Q21.

Additional questions

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.

No

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

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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.

No

Q25.

Do you have any other feedback about the ELS standards?

Q26.

Thank you!

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Q1.

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First name:

Prabhu

Q6. Last name:

Murali

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

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- ☐ Podiatry
- ☐ Psychology
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Q12.

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Clear

Q14.

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

No

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

Everything is fine

Q16.

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:

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3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

Might be helpful

Q17. 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?

It's very informative while explaining FAQ

Q18.

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 standards 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?

It's a great idea. Within 12 months people can prepare for their test without stress

Q19.

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

Band 6.5 can be consider for future changes

Q20.

Additional English language test types or modalities

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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 standards?

Home based test should have to amend.

Q21.

Additional questions

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.

Everything should be reconsider before changing

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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.

No

Q25.

Do you have any other feedback about the ELS standards?

Ahpra have to consider band 6.5 during the registration. With conditionally after migration people who scored 6.5 they have to score 7.5 band with maximum of two sittings within in 6 months or 12 months.

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

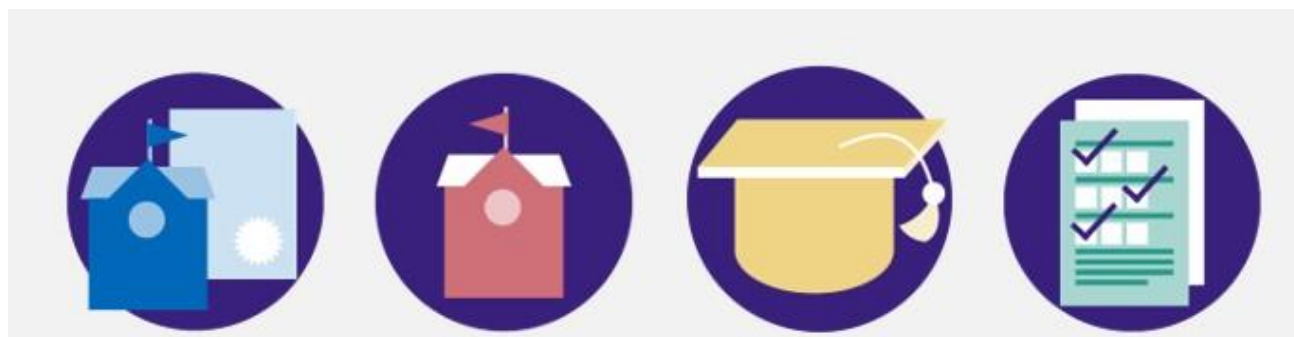
Review of the English Language Skills registration standards

Introduction

The Chinese Medicine, Chiropractic, Dental, Medical, Medical Radiation Practice, Nursing and Midwifery, Occupational Therapy, Optometry, Osteopathy, Paramedicine, Pharmacy, Physiotherapy, Podiatry and Psychology Boards of Australia (National Boards) are participating in the joint review of the English Language Skills registration standards (ELS Standards). To practise safely in Australia, registered health practitioners must have effective English language skills. This includes being able to communicate effectively with patients/clients/consumers and their relatives and carers, collaborate with other health care professionals and keep clear and accurate health records.

The National Boards set requirements for English language skills to make sure all registered health practitioners can provide safe care and communicate effectively in English. The ELS standard helps to ensure that everyone who registers as a health practitioner in Australia has these skills, regardless of their language background. The ELS standard is one of the five core registration standards required by all National Boards and applies to all applicants at initial (first) registration, whether they qualified in Australia or overseas.

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☒ No

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Q3. Which of the following best describes your organisation?

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Q4. Please describe your organisation.

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Q5. Your contact details

First name:

Serg

Q6. Last name:

Mezhov

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

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- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

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Which of the following health profession/s are you registered in, in Australia?
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- ☐ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☐ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☐ Other

Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

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- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

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Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

no, what if the person has done examination 20years ago, it should be excepted is it??!!!

Q14.

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

just as i was mention before lengs of recognition and differents sources of study

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

yes

Q16.

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:

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4. Test pathway (no change to current pathway name)

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

yes

Q17. 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?

yes

Q18.

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 standards 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?

depends on the situation , i think

Q19.

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

flexibility

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

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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 standards?

working environment standards

Q21.

Additional questions

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.

possible, but not sure

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

just length and reality of previous recognitions....

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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

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

no

Q24.

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.

no

Q25.

Do you have any other feedback about the ELS standards?

otherwise all good

Q26.

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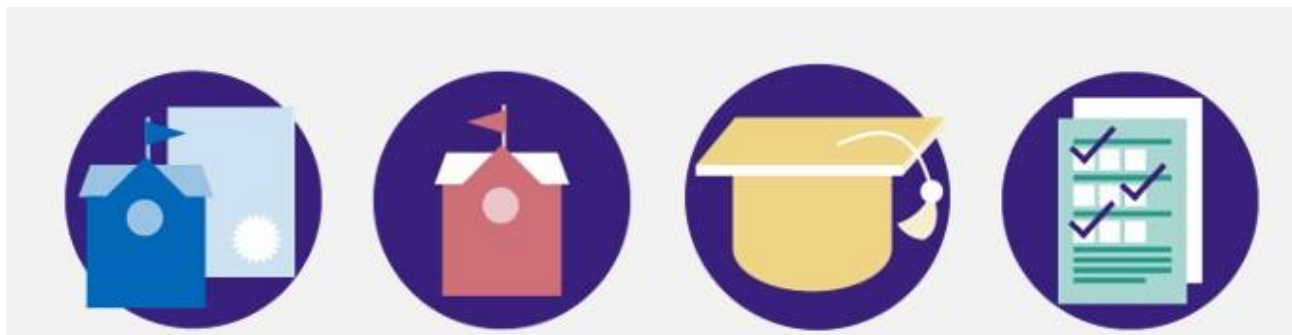
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Q5.

Your contact details

First name:

Sreejith

Q6. Last name:

Anakuthiyil Rajendran

Q7. Email address:

sreejithar1@gmail.com

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- ☐ Podiatry
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Yes

Q14.

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

Writing score to 6.5/ oet 300

Q15.

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Q19.

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Q24.

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.

Q25.

Do you have any other feedback about the ELS standards?

Q26.

Thank you!

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Q1.

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First name:

Suvarna

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Konde

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[REDACTED]

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Graduate

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It's not workable because nursing student learn three in universities and APHRA ask them English proficiency.

Q14.

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Who does University they should be excluded from this. As they spend three years in universities. I feel they are capable of good communication skills.

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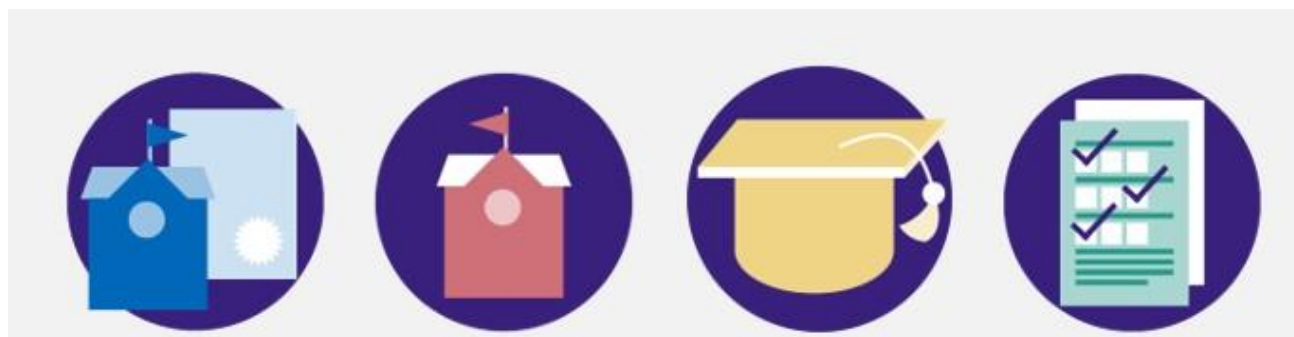
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Q5. Your contact details

First name:

Thomas

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Ricks

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[REDACTED]

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- adding the Cambridge C1 advanced and C2 proficiency tests to the accepted English language tests
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The following questions will help us to gather information about the revised ELS Standards.

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Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

Not really? What are the accepted tests or proof required for C1 level English?

Q14.

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

I would want to see what examples of tests are accepted with minimum scores. What proof require. Perhaps rationales of them?

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

Q16.

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:

1. Combined education pathway (no change to current pathway name)
2. School education pathway (currently named the primary language pathway)
3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

Q17. 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?

Yes it would be helpful.

Q18.

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 standards 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?

Q19.

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

Q20.

Additional English language test types or modalities

National Boards are aware of the evolving modalities/types of English language tests such as those delivered fully or partially by remote proctoring.

The proposed draft standard sets out the currently accepted English language test types and modalities. It 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.

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 standards?

Q21.

Additional questions

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.

Q22. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.

No

Q23.

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

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

No

Q24.

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.

No

Q25.

Do you have any other feedback about the ELS standards?

If this is specifically for international student applicants then will they be requirement for their admission to their prospective course? If it is towards internationally educated health care workers this seems very applicable. Would applicants who wanted to study health care worker in Australia be asked to follow this pre admission to their course?

Q26.

Thank you!

Thank you for participating in the public consultation.

Your answers will be used by the National Boards and Ahpra to improve the proposed revised ELS Registration Standard.

Q1.

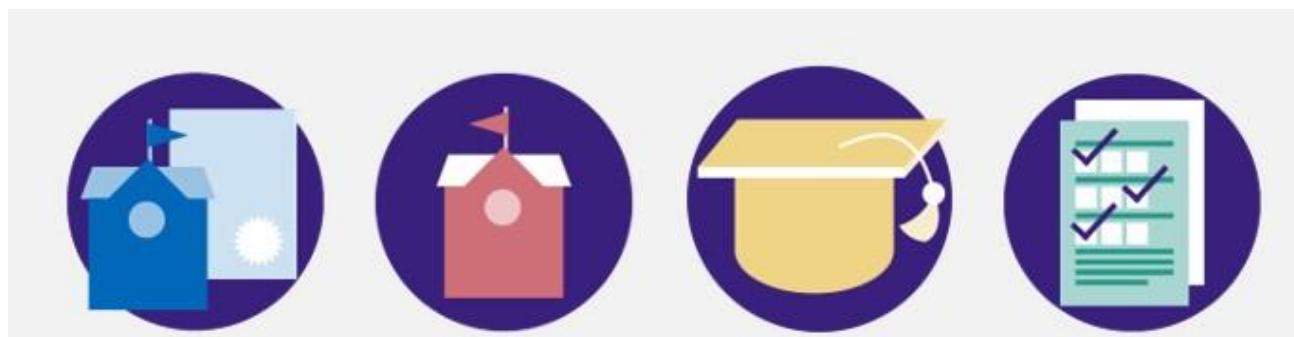
Review of the English Language Skills registration standards

Introduction

The Chinese Medicine, Chiropractic, Dental, Medical, Medical Radiation Practice, Nursing and Midwifery, Occupational Therapy, Optometry, Osteopathy, Paramedicine, Pharmacy, Physiotherapy, Podiatry and Psychology Boards of Australia (National Boards) are participating in the joint review of the English Language Skills registration standards (ELS Standards). To practise safely in Australia, registered health practitioners must have effective English language skills. This includes being able to communicate effectively with patients/clients/consumers and their relatives and carers, collaborate with other health care professionals and keep clear and accurate health records.

The National Boards set requirements for English language skills to make sure all registered health practitioners can provide safe care and communicate effectively in English. The ELS standard helps to ensure that everyone who registers as a health practitioner in Australia has these skills, regardless of their language background. The ELS standard is one of the five core registration standards required by all National Boards and applies to all applicants at initial (first) registration, whether they qualified in Australia or overseas.

The National Boards and the Australian Health Practitioner Regulation Agency (Ahpra) are seeking feedback about the proposed revised ELS Standards. Please ensure you have read the public consultation papers before answering this survey, as the questions are specific to the revised ELS Standards.



Q3. Publication of responses

The National Boards and Ahpra publish submissions at their discretion. We generally publish submissions on our websites to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our websites, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

The National Boards and Ahpra can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

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

Please select the box below if you do **not** want your responses to be published.

☐ Please do **not** publish my responses

Q1. About your responses

Are you responding on behalf of an organisation?

☐ Yes

☒ No

Q2. Please provide the name of the organisation.

This question was not displayed to the respondent.

Q3. Which of the following best describes your organisation?

This question was not displayed to the respondent.

Q4. Please describe your organisation.

This question was not displayed to the respondent.

Q5. Your contact details

First name:

Tita

Q6. Last name:

Widya

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

- ☒ I am a health practitioner
- ☐ I am a member of the community
- ☐ I am an employer (of health practitioners)
- ☐ Other

Q9. Please describe.

This question was not displayed to the respondent.

Q10.

Which of the following health profession/s are you registered in, in Australia?
You may select more than one answer.

- ☐ Aboriginal and Torres Strait Islander Health Practice
- ☐ Chinese Medicine
- ☐ Chiropractic
- ☐ Dental
- ☐ Medical
- ☐ Medical Radiation Practice
- ☐ Midwifery
- ☒ Nursing
- ☐ Occupational Therapy
- ☐ Optometry
- ☐ Osteopathy
- ☐ Paramedicine
- ☐ Pharmacy
- ☐ Physiotherapy
- ☐ Podiatry
- ☐ Psychology
- ☐ Other

Q11. Please describe.

This question was not displayed to the respondent.

Q12.

General

Ahpra and the National Boards (excluding the Aboriginal and Torres Strait Islander Health Practice Board of Australia) have reviewed their respective ELS standard to ensure that it stays current and keeps pace with our changing and dynamic environment.

We are only proposing changes to the common ELS standards where real improvements have been identified to align with available evidence, clarify processes, reduce duplication, streamline and remove unnecessary

information and address gaps in content. We have based any changes on research and international benchmarking and our regulatory experience.

The main changes proposed to the ELS standard common for all professions (except the NMBA) involved in the review are:

- clearer naming of the pathways in the standard
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- minor changes to improve wording and expression, and
- more active and personal language, making the ELS standards speak more directly to practitioners where appropriate.

The following questions will help us to gather information about the revised ELS Standards.

Please ensure you have read the public consultation paper (including the revised ELS Standards) before responding, as the questions are specific to the revised ELS Standards.

Q13. Is the content, language and structure of the proposed revised ELS standards clear, relevant and workable? Why or why not?

The content, language and structure of the proposed revised ELS standards are clear, relevant, and workable. There are no ambiguous statement.

Q14.

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

Nursing and Midwifery professions need to be added, mentioned clearly in the professions list in page 18 that can registered in all ELS pathways

Q15.

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 standards
- reorganised content to make the sequence more logical, and
- minor rewording

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

Yes, the proposed pathways are clear, relevant and workable

Q16.

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:

1. Combined education pathway (no change to current pathway name)
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3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

I'm agree with the new names, very defined each pathway and clear

Q17. 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?

Yes, the examples are very important to gain more understanding for the health practitioners. Adding in the FAQ sheet will be more informative

Q18.

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 standards 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?

As the cost of the test are expensive, so 12 months maximum gives the health practitioner better opportunity to adapt and learn the language especially in the clinical area

Q19.

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

Nursing and Midwifery needs to be placed equal with other health professions

Q20.

Additional English language test types or modalities

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

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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.

Q25.

Do you have any other feedback about the ELS standards?

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Thank you!

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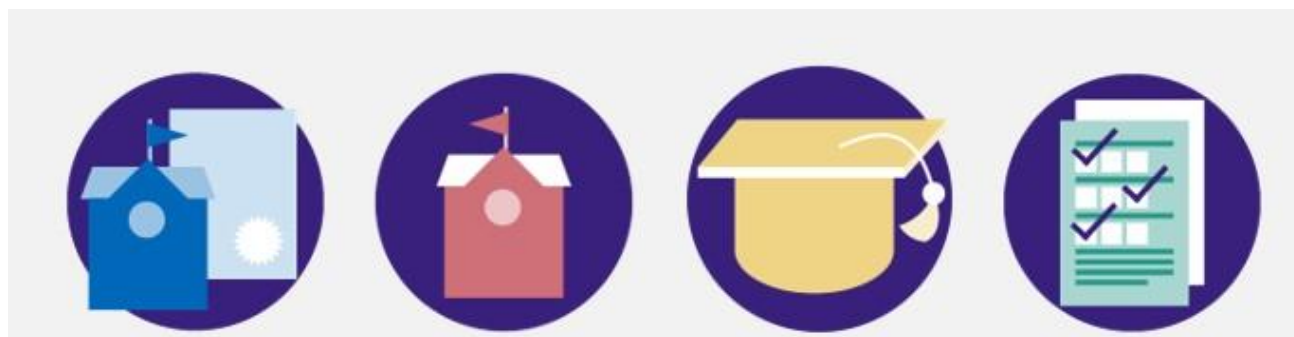
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YiZhong

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Zhuang

Q7. Email address:

[REDACTED]

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3. Advanced education pathway (currently named the extended education pathway)
4. Test pathway (no change to current pathway name)

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

To an extent. I think calling 3 tertiary education pathway would be clearer

Q17. 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?

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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?

Yes

Q19.

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

It should allow students from Singapore, Hong Kong, South Africa, and Malaysia, and possibly also India, Nigeria, and Pakistan and perhaps some other Commonwealth countries who graduate from an Australian medical degree program be recognised without having to take a test, similar to how the MCNZ does. Also, if medical applicants have a degree taught in English and also evidence of high school English from Singapore and the other countries mentioned above, this should be recognised without further testing required

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Q25.

Do you have any other feedback about the ELS standards?

Q26.

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