

12 November 2013

Dr Joanna Flynn AM
Chair
Medical Board of Australia

Email: standard.consultation@ahpra.gov.au

Dear Joanna

RE: Review of Criminal history registration standard and English language skills registration standard

Thank you for your email of 28 October seeking the Royal College of Pathologists of Australasia's (the College) feedback on the above consultation documents.

The College supports the National Boards preference of *Option 1 – Status quo* in the *Review of Criminal history registration standard*.

The College would like to make the following comments in response to the questions raised in the *Review of English language skills registration standard* document:

1. *From your perspective, how is the current registration standard working?*
The current registration standard is working. It is appropriate.
2. *Should the countries recognised in the standard be consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing? (If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?*
Yes.
3. *Is there any evidence to assist National Boards to assess whether there are any additional countries that should be recognised in their English language skills registration standard?*
The College is not aware of any additional countries.
4. *Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standards?*
The College has no further comments to raise.
5. *Should National Boards accept results from more than one sitting or is there a better way to address this issue, such as the approaches described above?*
The College's recommendation is to accept results only from one sitting.

6. *Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?*
Yes.
7. *Is there any content that needs to be changed or deleted in the revised draft registration standard?*
No.
8. *Is there anything missing that needs to be added to the revised draft registration standard?*
No.
9. *Do you have any other comments on the revised registration draft standard?*
No.

Revised draft English language skills registration standard - Registration standard: English language skills

4(a) on page 16

The College supports the current position in the first option re one test sitting in a 12 month period be used.

Test results (page 16)

The College supports the current position ie. '*within two years prior to applying for registration*'.

Yours sincerely

Dr Debra Graves
Chief Executive Officer