

11 September 2023

Ahpra and National Boards

By Email: [AhpraConsultation@ahpra.gov.au](mailto:AhpraConsultation@ahpra.gov.au)

**Australian College of Rural and  
Remote Medicine Limited**

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Dear Ahpra and National Boards,

**Re: Public Consultation on two further possible changes to the National Board English language skills requirement**

This letter is in response to your request for feedback on two further possible changes to English language requirements.

The Kruk Review made several recommendations around changes to English language requirements, including reducing the IELTS writing score minimum standard to 6.5 (but maintain reading, speaking, listening standards); and the inclusion of more countries as recognised English language jurisdictions.

As stated in our [Feedback on the Kruk Review Interim Report](#), ACRRM advocates for the provision of safe and high quality healthcare for people in rural and remote communities. An important component of this care is that these communities are served by doctors who understand what their patients are saying and who are able to be understood by their patients. The College raised concerns regarding the proposal to lower the current language standards and stated that any lowering would need to be accommodated by assessment hurdles which rigorously test the consultation-based language/communication skills of the practitioner.

We note that the current IELTS minimum score is 7 across written, reading, speaking and listening, and the proposal is to leave the minimum score for reading, speaking and listening intact at 7, and reduce the score for written English to 6.5. An overall score of 7 would still be required, however the fact that the test averages scores out across categories is of concern.

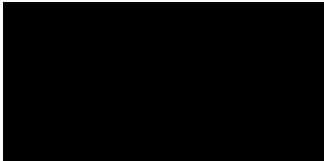
There is a considerable difference in written English between bands 6 and 7, with scores at band 6 indicating a lack of precision in word choice, and higher degrees of inaccuracy. This is problematic in the context of written English, particularly for doctors writing patient notes or making referrals.

With reference to your questions around specific impacts on vulnerable groups and Aboriginal and Torres Strait Islander peoples, in the view of the College, all patients are potentially impacted by doctors with below-par skills in written English. However, a lack of precision has the potential to adversely impact Aboriginal and Torres Strait Islander patients. English is often a second, third or fourth language in remote and very remote communities, and patients rely on translators or other family members to assist with following management plans or other written instructions.

For these reasons, the College considers that the status quo arrangements with respect to the IELTS writing score minimum standard should be maintained.

Representatives from the College would be happy to discuss our concerns in more detail if required.

Yours sincerely



Marita Cowie AM  
**Chief Executive Officer**