

English language skills registration standard review - submission template

The National Boards are inviting general comments on a revised *English language skills registration standard* (ELS standard) as well as feedback on the following questions. All questions are optional, and you are welcome to respond to as many as are relevant or that you have a view on.

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

Do you want your responses to be published?

- ☒ **Yes I want my responses to be published**
- ☐ No I do not want my responses to be published

Name: [REDACTED]

Organisation: The Royal Australian and New Zealand College of Psychiatrists

Contact email: [REDACTED]

<p>1. Is the content, language and structure of the proposed revised ELS standard clear, relevant and workable? Why or why not?</p>
<p>The content, language and structure of the proposed revised ELS standards is clear, relevant and workable.</p>
<p>2. Is there any content that needs to be changed, added or removed in the proposed revised ELS standard? If so, please give details.</p>
<p>No.</p>
<p>3. Please see consultation paper for all proposed changes to the ELS pathways. Some of the main changes proposed to the ELS pathways are:</p> <ul style="list-style-type: none"> • clear naming of four pathways within the Standard • reorganised content to make the sequence more logical, and • minor rewording. <p>Are the proposed pathways clear, relevant and workable? Why or why not?</p>
<p>The proposed changes are clear, relevant and workable.</p>

4. 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:

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

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

The new names for the pathways are clear. However, under the School Education Pathway, the definition of 'main language' seems unnecessary as it is untestable.

Under the School Education Pathway, it states:

*"English is your **main language** and you have carried out and successfully completed: a.) at least 10 years of your primary and secondary school education which was taught and assessed solely in English in a recognised country."*

Main language is also defined in the document as *"the language primarily used for reading, writing, listening, speaking and the language best known and most comfortable with."*

This does not necessarily make sense for those who use one language at home with family but who were entirely educated in English in a 'recognised country' and utilize English as their preferred language professionally and outside immediate family. Furthermore, it raises concern regarding how this could be assessed other than based on individuals responses.

It is therefore suggested that including the definition of 'main language' may not add anything here.

5. **Is it helpful to include examples in the definitions section of the ELS standard 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 would be helpful to include examples in the 'Definitions' sections of the ELS standard as having all the relevant information one place may benefit users.

6. 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 standard 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?

Increasing the period for accepting test results from two test sittings from a maximum of 6 months to 12 months is workable. The RANZCP suggests that the time-period could be further revised to allow results to be considered for as long as tests results are valid.

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

The RANZCP currently accepts an overall IELTS score of 7 recognising the importance of a high standard of ELS in the areas of listening, speaking and writing for Psychiatry. No further considerations are proposed at this time.

8. The proposed draft standard sets out the currently accepted test types and modalities and 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

9. **Are there any additional considerations National Boards should be aware of when deciding whether to approve a new test modality or type by an accepted English language test provider as suitable for the purposes of meeting the ELS standard?**

Should a new test type or modality be approved, the RANZCP suggests a standard consultation period should take place so individuals can provide feedback for suitability.

The National Boards are also interested in your views on the following specific questions:

10. **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 RANZCP recognises doctors wishing to migrate to Australia to gain medical registration may already have many costs associated and does not envisage the proposed changes to the ELS pathways would result in any increase in costs. The exception would be for South African candidates who would be required to undertake the ELS Test Pathway to demonstrate ELS proficiency.

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

It is understood that the proposed removal of South Africa from the list of recognised countries in the ELS standard is to be in line with the requirements of the Department of Home Affairs (formerly known as the Department of Immigration and Border Protection).

A possible concern with South Africa being removed from this list could mean a reduction in the number of future applicants for the Specialist Pathway Assessment.

Applicants from this country previously could apply via AHPRA to be exempt from the ELS requirement if their medical qualifications were taught and assessed in English. With the proposed removal of South Africa from the list of recognised countries, the requirement for applicants of this country to demonstrate ELS proficiency via the Test Pathway may be perceived as a barrier for entry.

12. **Would the proposed changes to the ELS standards result in any potential negative or unintended effects for people vulnerable to harm¹ in the community? If so, please describe them.**

N/A

13. 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.

N/A

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

There is no other feedback at this time