

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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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:

Abdul-Kadir

Q6. Last name:

Hussein

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.

PhD in Nursing (unregistered Nurse)

Q10.

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

This question was not displayed to the respondent.

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?

It is clear but it is not flexible.

Q14.

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

Regarding the advanced English pathway, increase the maximum years from 2 to 4. for instance, I got PhD in nursing for the university of Sydney and the got Bachelor in nursing from WSU. I studied 7 years in Australia (5 years full time in PhD and 3 years gap then 2 years in Bachelor of nursing), however, I am still unable to be as a registered nurse in Australia without doing the English test.

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?

Advanced Education pathway need to be more flexible to give a fair chance for this group of people.

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?

The proposed name of the four pathways 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. That will be more helpful to fully understand.

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. it gives more chance when we accept the test withi8n 12 months.

Q19.

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

The national boards should consider the old people from overseas who are meeting the education requirement and working for 5 years or more in health scoter to get registration without need to do an English test.

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 should be more flexible.

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.

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?

I wish more flexibility in the Advanced Education Pathway.

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.

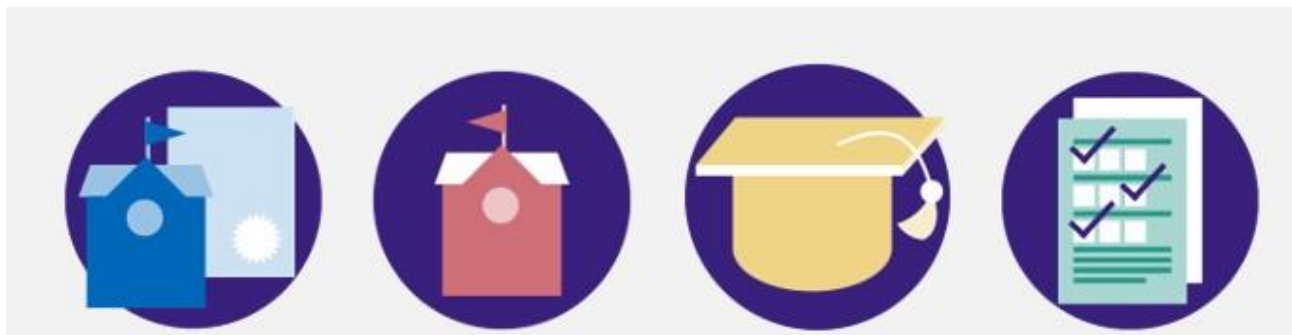
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Q4. Please describe your organisation.

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First name:

Abigail

Q6. Last name:

Konadu

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

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- ☐ 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.

Not yet registered but an international midwife

Q12.

General

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It will help make the exams essay to understand and take

Q14.

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

South Africa should not be excluded

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 , because clear naming of pathways will help to know the exact exams to take at a particular time.

Q16.

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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 they are very 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?

Examples when added will be great for people to understand what they are doing

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?

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No

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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?

Addition of English proficiency from university.

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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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?

No

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Thank you!

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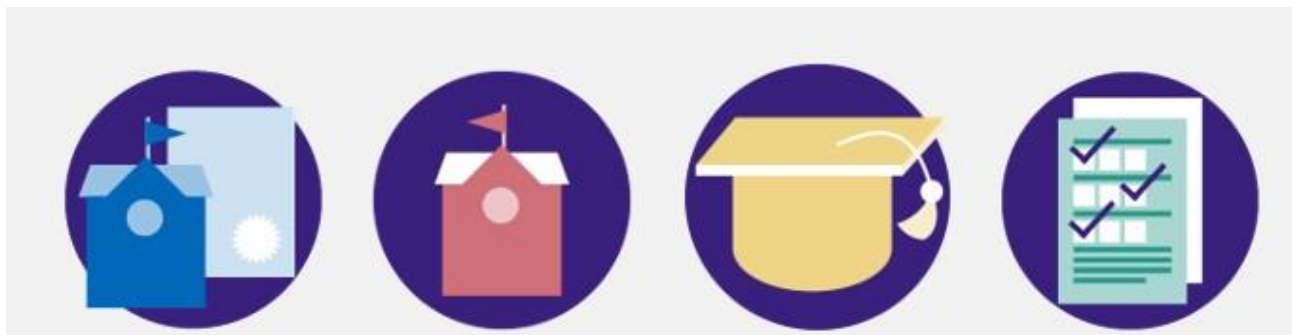
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First name:

ATM Mizanur

Q6. Last name:

Rahman

Q7. Email address:

[REDACTED]

Q8.

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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.

Australian Citizens should not need to sit for English tests if studied in Australia.

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

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?

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?

Remove the English Test requirement for Australian Citizens studying in Australian Universities.

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?

PTE, IELTS

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, citizens of Australia should not need an English test pathway to register as RN. They studied at Australia Universities. They know the English Language well as completing studies here. This pathway delays their work, mental stress, and financial stress and discourages them to get qualifications to full fill the shortage of RNs in Australia.

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

This pathway delays RN's registration to work, mental stress, and financial stress and discourages them to get qualifications to full fill the shortage of RNs in Australia.

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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

This pathway delays RN registration after completing studies to work. Affect their mental stress, financial stress and discourages them to get qualifications to full fill the shortage of RNs in Australia.

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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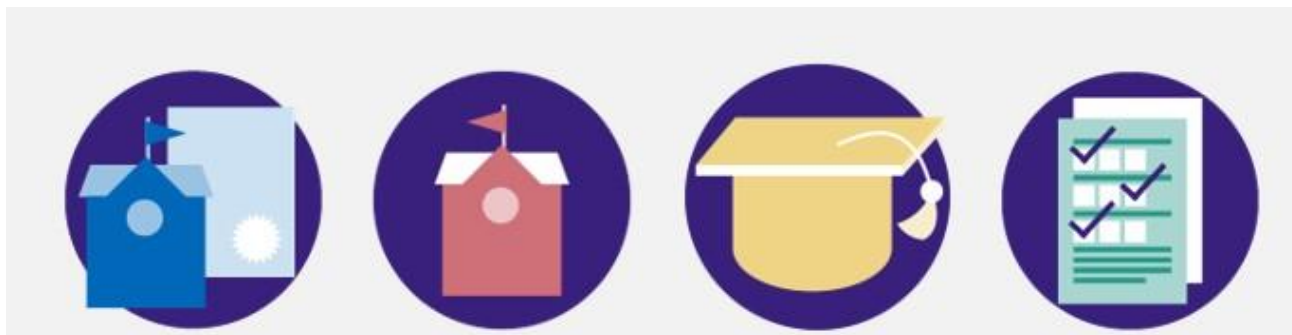
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First name:

Bernadette

Q6. Last name:

Mulcahy

Q7. Email address:

[REDACTED]

Q8.

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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.

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. It is simple in its aim and function.

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. Great use of case studies in describing when/where a pathway is required

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. Easy 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?

Yes. Provides clarity

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. Allows more time to work on improvements

Q19.

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

Possibly? Is it clear what to do when a standard isn't met? And what mandatory requirement is there for facility or board to follow up with individual? (Not leave it to be individual to follow up).

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?

Have the modalities been "peer reviewed" can you trial them prior to use?

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.

Implications for practitioners is what role they have in following up with individual clinician (time/effort involved).

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

Unsure

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 that I can envisage

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.

Unsure - possibly not?

Q25.

Do you have any other feedback about the ELS standards?

Nil.

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.

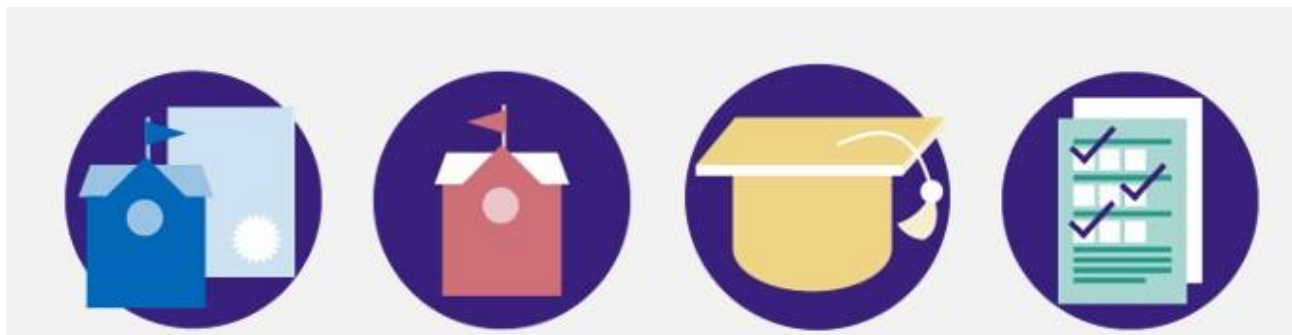
Review of the English Language Skills registration standards

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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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Q1. About your responses

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☐ 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:

Bhavana

Q6. Last name:

Mohan

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

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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?

It is not always workable.

Q14.

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

Why Australian graduates needs to get English test again, students are appearing English test prior to their nursing enrolment and still they have to appear exam for registration, So the aphra is point outing that Australian University's English and education is not good enough

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 don't think so Could make clarity and expand the details

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?

No . Pathway needs to be replaced

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. Please explain what you mean by continues study. Which mean how many weeks study, whether its full time or part time and how many weeks break they can take as a break

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?

Its is good

Q19.

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

Consider Australian graduates for registration without sitting an exam

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?

Not sure

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.

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?

No

Q26.

Thank you!

Thank you for participating in the public consultation.

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Q1.

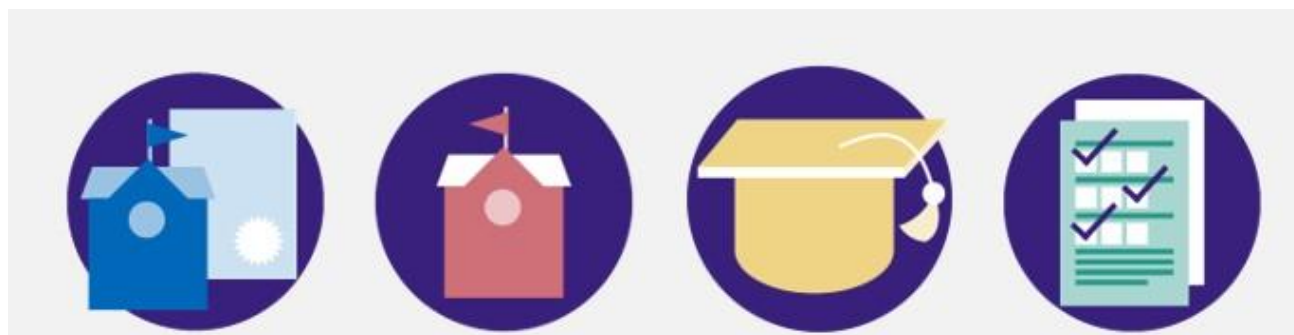
Review of the English Language Skills registration standards

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This question was not displayed to the respondent.

Q5. Your contact details

First name:

Daniela

Q6. Last name:

Huepe

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

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- ☐ I am a member of the community
- ☐ 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.

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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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Q14.

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

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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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- minor rewording

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Q16.

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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?

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?

Definitely helpful

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?

This will give the candidate the opportunity to get prepared, which is good.

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

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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 they should be the academic format of the tests. For example IELTS has a general and an academic version. I can imagine that fit should be the academic one if the test is for professionals. Not sure if it is like this currently though.

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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*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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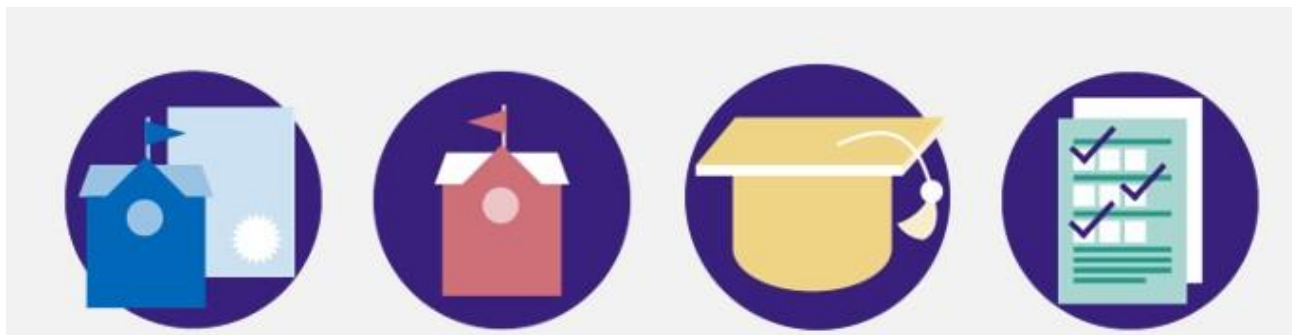
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First name:

Eileen

Q6. Last name:

OToole

Q7. Email address:

[REDACTED]

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- ☐ Podiatry
- ☐ Psychology
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Q11. Please describe.

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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.

No

Q15.

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

Yes provides clarity.

Q16.

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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?

Yes provides additional guidance.

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 always provide examples as a reference.

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 keep to current workable timelines.

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

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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?

Ensure validated consistent processes.

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.

Not aware of any additional cost implications.

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

Always potential unintended negative impact vulnerable / marginalised groups. Requires identified risk management management framework.

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?

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.

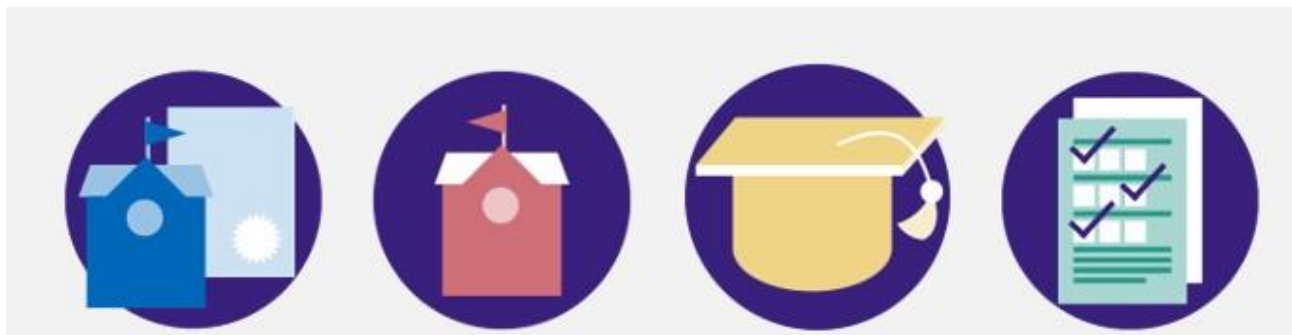
Review of the English Language Skills registration standards

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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Q4. Please describe your organisation.

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Q5. Your contact details

First name:

Evelyn

Q6. Last name:

Coral

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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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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- 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?

Q14.

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

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)
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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?

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?

I don't believe test results should be combined at all

Q19.

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

I currently work with many nurses that have ESL, some of whom are very difficult to understand and likewise for the patients to understand. I do wonder about the standards/moderation of the testing. Additionally some nurse with poor language skills appear to have been except form sitting the test. We need overseas staff, however the language testing process must be robust to protect both the nurse and the patient.

Q20.

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As per my previous statement. Additionally is the English language tested in a simulated environment for nursing? e.g. noise, with patients that may be compromised, hard of hearing etc.; with PPE on; rapid instructions in acute settings etc.

Q21.

Additional questions

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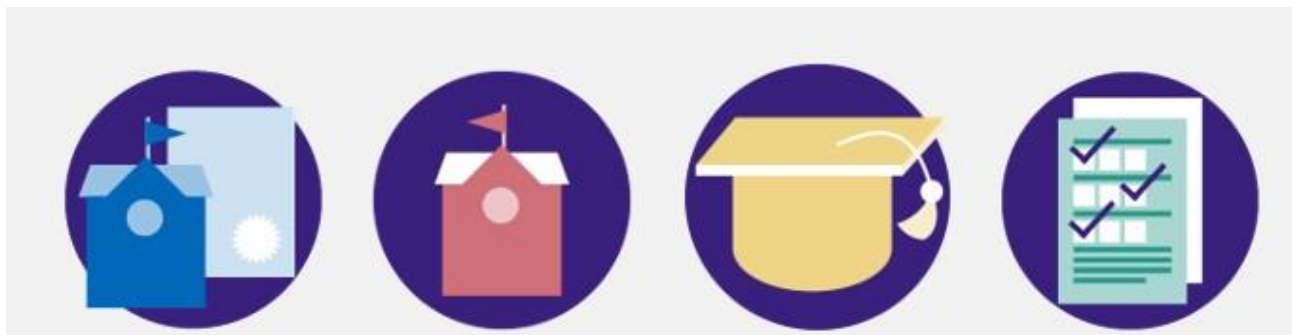
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Gagandeep

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Singh

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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?

The content ,language and structure of the proposed revised ELS standards does not clearly states what are the requirements for a person who will undertake the study into the medical profession. Who is not born in Australia and has come here under the family stream visas or could be Skilled stream, But like to pursue a medical professional education.

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 suggest we clearly create a section for potential students, Who are born in non recognised English speaking countries. and People who have completed certificate 3 or 4 in other disciplines or medical related but have not completed secondary education in Australia. from personal experience, For this above mentioned category, requirement to get admission should be marginally lower. For Example IELTS overall 7. 7 for Listening and speaking, but 6.5 for writing and reading. This level of English should be sufficient for a students to enroll. Once a 3 years bachelors is completed in Australia, I am very confident , English of this person would have improved to 7 in all English skills, in fact may reach 7.5. Currently, I see this requirement is unreasonable , as English is a Language. Improving speaking and listening if a person is living in an English speaking country. Improving writing and reading is a process which happens with a lot of effort, which is hard to create unless you are enrolled in an university qualification. If what I am saying is false, I would like the authorities to conduct a trial exam, where a sample of 10 to 50 native English speaking people, not yet enrolled at any undergraduate course, gives few of these English tests recognised by the board(PTE Ace, IELTS Ace, OET etc. Findings of the results achieved should be published on the AHPRA website and attached to the English registration and entry English requirement standards. In this way, people like myself have clear understanding and rational reasons and evident explanations provided. Board should not make the rules as they thinks it sounds good, but should be based on evidence. Yes in the perfect world , we should have everyone have perfect English, But we should not forget Australia is a migrant Nation, and relies on the migration to full fill its skill shortages. if by allowing student to study at the above proposed requirement, we create an extra 5% workforce, then this is better because existing population growth on its own does not and will not provide sufficient workforce. we should not let the perfect in the way of good. This answer will receive only 6.5 in writing a response, because it does not create complex structure. I believe it does not need complex structure to understand or to get the message across.

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

No the new name is still following the same fundamental approach. more appropriate heading would be 6 years continues education pathway.

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, to an extent, but it does not cover all eventualities. we should have an example for a person who has come to Australia under a family migration pathway and would like to study at an Australian University.

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, but how about the time validity of the test, which is 2 years.

Q19.

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

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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

Yes, The current English Standards, does not protect migrant women, who come here under the family migration stream. Starts their life at age 28 onwards, Have kids, work part-time, look after families. then with all that they have to achieve a lottery English test of 7 each in IELTS or equivalent. This particular group of women will have less superannuation, less income then their males. Medical profession is a female dominated sector just as Engineering is a Male dominated. We should also include this consideration into the mix of factors. Unless, we are not concerned. In 30 years time we will have a few of this women homeless. Because they were not allowed or assisted to obtain university qualification.

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.

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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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- 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 and no , ELS standard also need to consider for years of experience in regard with the same field of experience

Q14.

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

Number of work of experience, and certificate of attainment

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?

Not 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?

Be more specific

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?

Any other option for English test like face to face interview

Q19.

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

Please consider work of experience with the recommendation letter from the company that person communicate well.

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?

Exemption for those who finished diploma in australia like Enrolled Nurse

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.

Not sure

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

Not sure

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

Yes

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?

P

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.

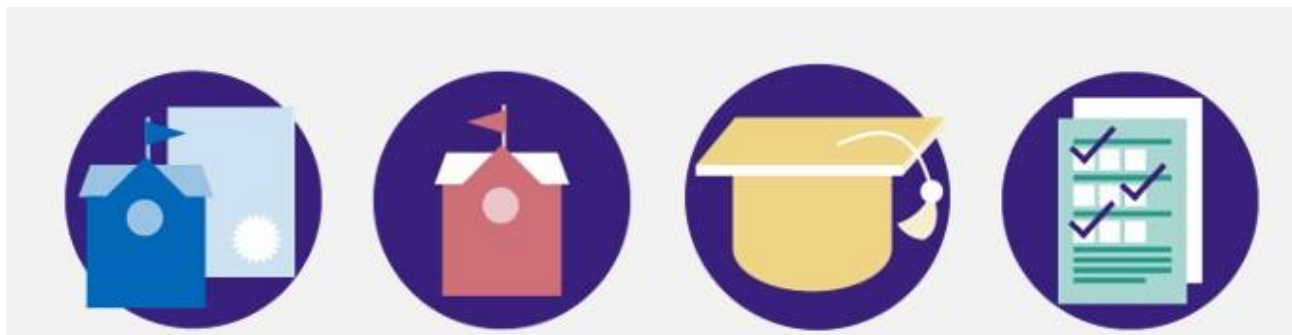
Review of the English Language Skills registration standards

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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☐ Yes

☒ No

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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:

Jacqueline

Q6. Last name:

Anderson

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.

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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?

No. In the Advanced Education Pathway, it is not clear if you are still requiring applicants to complete a 6 year degree in a recognised country, or whether just an AQF7 degree in any country where it is conducted in English will suffice

Q14.

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

In the Advanced Education pathway, it should still be the case that 6 years of education in a recognised country is the base requirement. The addition of that education being at AQF7 is a good addition, but only if applicants are still required to complete 6 years in a recognised country.

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?

The above dot point changes seem clear relevant and workable. As per my previous response, the exception is regarding the Advanced Education pathway, which currently reads as though you are not going to require applicants to do 6 years of education in a recognised country. This is very problematic if this is the case.

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 seem clear and to reflect the options better

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?

A prototypical example is helpful in the definitions section, as it clarifies the intent of the pathway. More complex/unclear examples would be helpful in the supporting material, to assist with 'grey' area cases

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 someone who examines health practitioner students at the postgraduate level in both written and oral English, I know from experience that skills that are not being practiced regularly (i.e. for someone residing outside of an English speaking country) can degrade quite quickly. I would therefore keep it to a 6 month timeframe, as 12 months provides too long an opportunity for skills to degrade between one test type and another, which means that the final test result may be derived from out of date skill achievement data (i.e. the data that was collected 12 months prior).

Q19.

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

In my view Psychology spoken language standards should be higher than that required for many other health practitioners. Psychologists provide therapy in oral form and therefore rely much more heavily on spoken language for intervention success than most other health professionals. Therefore they need much higher levels of expressive and comprehensive oral English language skills than most other practitioners (e.g. podiatrists).

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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International standards of what tests are accepted

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.

If the Advanced Education pathway reduces their requirement from 6 years of study in a recognised country to a degree at AQF7 in English (anywhere) this could easily have the effect of reducing the quality of English of these applicants

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

If the Advanced Education pathway requires a lower standard of English competency (see previous responses) then this would have an impact on all people who are vulnerable to harm as communication between the practitioner and these individuals would be compromised.

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.

As per my previous response.

Q25.

Do you have any other feedback about the ELS standards?

Q26.

Thank you!

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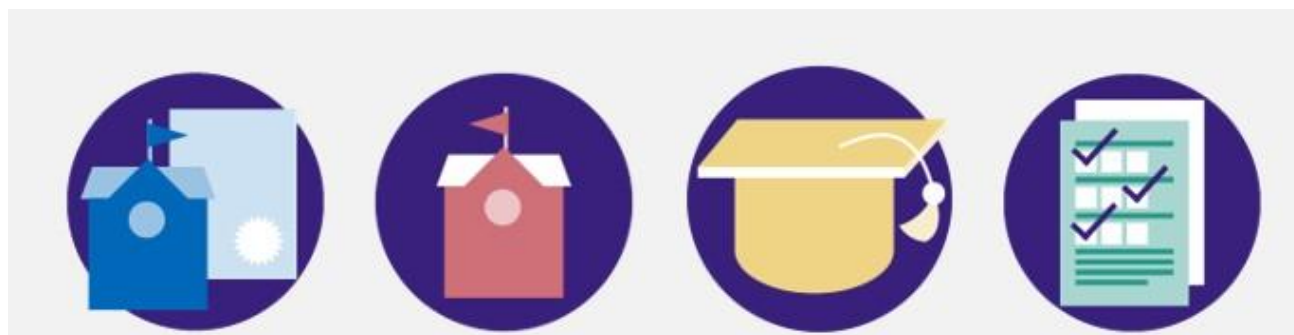
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Q6. Last name:

George

Q7. Email address:

[REDACTED]

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- ☐ I am an employer (of health practitioners)
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Which of the following health profession/s are you registered in, in Australia?
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No, Especially who completed professional degree here 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.

They need to change English standard requirement who completed professional health degree .As part of degree they are living in Australia around four or five years for their studies and placements. In my opinion they do not need English language requirement.

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 is not clear who completed degree in Australia.

Q16.

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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?

Not clear combined Education pathway

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?

Some are clear and some are not.

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?

It will be great to change to 12 months ,especially who writes OET exam.

Q19.

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

yes. Especially who completed professional health degree in Australia .

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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 National board do not needed look at the provider. If applicant can speak and write English competently in their profession during internship, they do not needed English language requirement

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 it need some 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

In my opinion ,Who completed professional degree and worked some time in Australia, they know the system very well. It may not affect any negative impact on 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

Q25.

Do you have any other feedback about the ELS standards?

Revising standards should be good in every two years.

Q26.

Thank you!

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Q1.

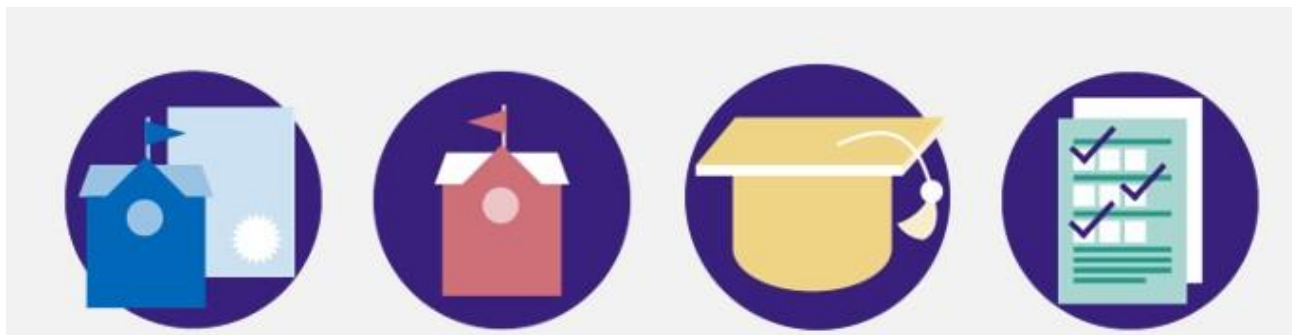
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Jolish

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

Yes

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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?

That will be good

Q19.

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

In my opinion, students who completed bachelor degree in Nursing from Australian universities should get registration after their successful completion without ELS standard . Because they studied in Australian universities and gain practice experience from our hospitals. Without English knowledge no one can complete their course in here . I think nearly 24 subjects with 3 assessments . So approx 75 assignment and more than 800 hrs hospital placement. Our universities are the world's best. Even in new Zealand the students who complete there nursing program, can apply for registration without another English test. In this pandemic time a large number of university nursing degree holders still working in McDonald's/ with Uber because they didn't have registration.

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?

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.

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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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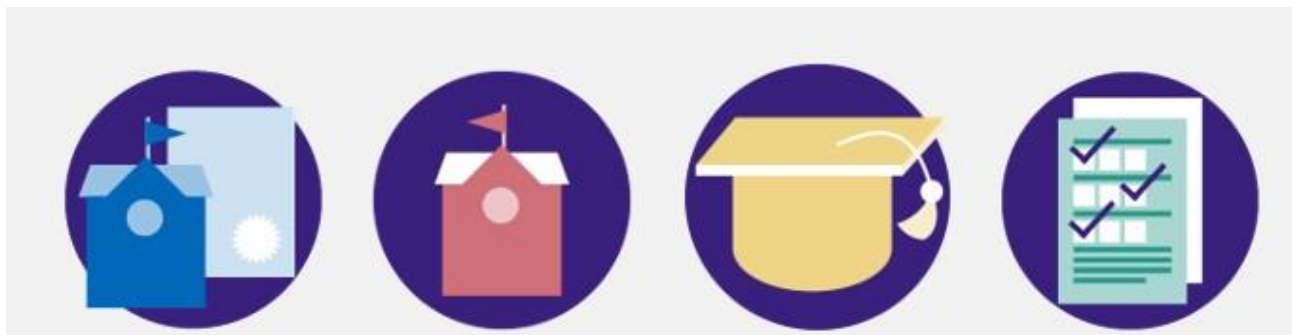
Review of the English Language Skills registration standards

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Q5. Your contact details

First name:

Jose Miguel

Q6. Last name:

Barragan Flores

Q7. Email address:

[REDACTED]

Q8.

Which of the following best describes you?

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

Q9. Please describe.

Physiotherapy Student

Q10.

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

This question was not displayed to the respondent.

Q11. Please describe.

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Q12.

General

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- 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 is. Also unfair with people studying full time degrees in Australia and being obliged to pass through a costly and non-relevant English test prior to register when succeeding for 4 years with the content and placement

Q14.

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

Those registering for the first time that have studied a recognized degree in full in Australia should be exempt from those exams. They do the English test prior to enrolling in the degree

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?

Changing names and not the existing unfair points is pointless

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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?

Why 12 months? If you relay in those external assessors and they give validity to their test for 24 months, why Ahpra decide to establish 12 months? How is fair that someone obtaining the combined results 13 months prior to enrolling in an accredited university have to sit the English test again to enrol with Ahpra?

Q19.

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

Accept the combined results from 2 test or the result from a single test sit within 24 months prior to enrolling full time in a degree, as established by the English assessors (e.g. IELTS)

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?

What about accepting people who has studied and succeeded in an accredited Australian University?

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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*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?

I think they should be reconsidered and open to reasonable exemptions. They are not fair as they are, and not allowing common sense to study specific situations is just unreasonable and unjustifiable

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.

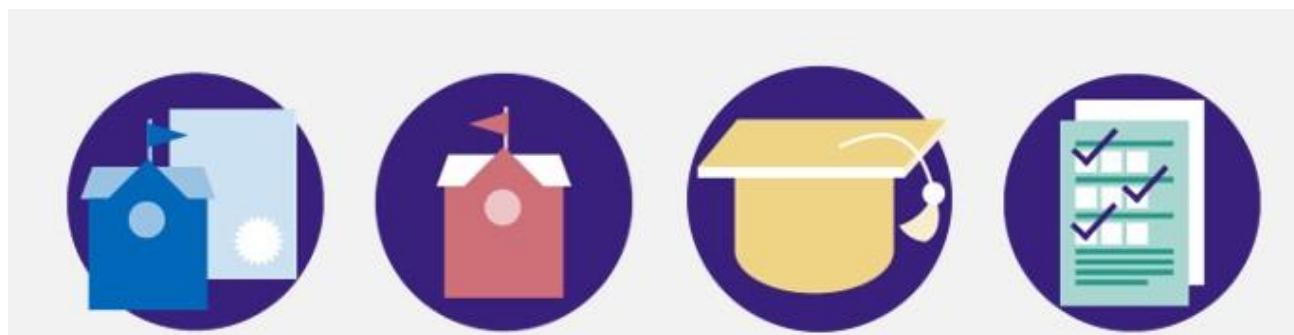
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Q5. Your contact details

First name:

Joshua

Q6. Last name:

Wu

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

Q11. Please describe.

This question was not displayed to the respondent.

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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.

Regarding the Condition for Chinese medicine practitioners' language requirements, is it possible to put the domestic working experience into the consideration? Since most of the practitioners with the conditional registration have been working in Australia for 10 years, AHPRA should update some guidelines or other pathways for this group of people getting the full registration.

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

Yes

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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?

Names are clear.

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Examples are necessary to explain the definition.

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?

Definitely workable.

Q19.

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

Working experience should be considered in this proposal.

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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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.

Not sure at this stage.

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No.

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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

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.

Aboriginal language competence should be added as a language requirement for all AHPRA practitioners to make sure all Aboriginal and Torres Strait Islander people could receive equal treatment opportunities and communication.

Q25.

Do you have any other feedback about the ELS standards?

Consider the removal of Conditional registration for Chinese medicine practitioners since most of the practitioners have been working in Australia for 10 years.

Q26.

Thank you!

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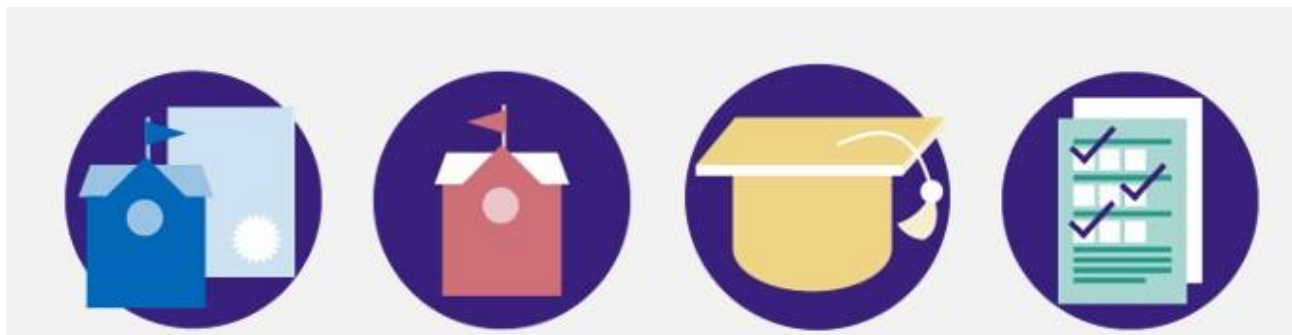
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Juan

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Stephen

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Q14.

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When I was completing medical school, enable to obtain my registration with AHPRA, I was required to complete an English language test. This was because I was a permanent resident when I first commenced my medical degree in Australia. What I found annoying and ridiculous was the fact that I had obtained an undergraduate degree in Australia, had almost completed a postgraduate medical degree by the time I was applying for my registration, lived in the country for almost a decade, completed an English language test for my permanent residency a few years prior and still had to sit another English test. This was completely unnecessary and a waste of time and money. There should have been absolutely no doubt regarding my English language proficiency by that stage and yet I had to spend money and time to sit a test which surely could have been avoided.

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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:

Lucia

Q6. Last name:

Colodro Conde

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
- 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?

Q14.

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

For overseas applicants who have been living and working in Australia in English for many years, after having passed the Department of Immigration standards etc seems unnecessary to have to provide another set of English language test results.

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?

Including them in the Standards would keep all the information together instead of it being spread in different documents, which makes the process more cumbersome.

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 more flexible so I don't see a reason to go back to 6 months

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.

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?

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.