

### English language skills registration standard review - submission template

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

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

Do you want your responses to be published?

☐ Yes I want my responses to be published

☐ No I do not want my responses to be published

Name: \_\_\_\_\_

Organisation: \_\_\_\_\_ Australian Society of Medical Imaging and Radiation Therapy \_\_\_\_\_

Contact email: \_\_\_\_\_

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

The proposed changes to the English Language Standards seem reasonable. ASMIRT understands from experience with overseas applicants that no matter how simple the requirements appear, applicants do misunderstand requirements. ASMIRT believe that changes to the language and the inclusion of examples will assist.

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

NIL

#### 3. 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 Standard
- reorganised content to make the sequence more logical, and
- minor rewording.

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

NIL

#### 4. The pathways have been re-named to help applicants understand them better. The pathways have been reordered and additional guidance provided to applicants on which pathway may be suitable.

It is proposed to name the four pathways as follows:

- Combined education pathway (no change to current pathway name)

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

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

ASMIRT queries the notion of '10 years of primary and secondary school' because 8 years in primary school plus 2 in secondary school does not necessarily provide the person with the English Language skills required to interact with patients and their families/carers. This may address the conversational perspective; however, this language is not used to learn the terminology of their profession. The example here is the situation of a 14/15-year-old in a medical situation with a family member – they will not have the ability to translate the medical terminology accurately. This is the reason for a highly qualified and accredited medical interpreter. Occupational or Academic English is not the same language used when communicating with patients. Passing an English Language test demonstrates that you can go shopping, not that you can work as a registered healthcare professional and communicate effectively.

Secondly, if the country of origin is not recognised, then why is it accepted that the applicant's qualification was taught and assessed in English (i.e. their entry requirements are not the same as Australia). This element is confusing.

ASMIRT seeks to understand why the term 'advanced' is used instead of the word 'tertiary'? ASMIRT's understanding is that the term tertiary includes everything above secondary education which appears to be incorporated into primary education in these ELS standards.

The use of this terminology is confusing as it does not align with the Australian primary/secondary/tertiary education model. ASMIRT seek clarity on which overseas qualifications are eligible for registration but are not at AQF Level 7, thereby requiring 'advanced education'? ASMIRT suggests that an example is provided to minimise confusion.

In the Test pathway example, if Elisa completed her OT qualification from an Ahpra accredited institution, does this not automatically make her eligible for Ahpra registration upon graduation? The FAQs state that she is not. ASMIRT is not aware of any graduates not being registered due to English Language requirements. ASMIRT believes that the issue of education providers having different entry requirements could be easily resolved by Programme Accreditation requiring the same level of English Language skills as the profession. ASMIRT suggests that if "There is little research evidence about how completing an approved program of study develops English language skills of non-native speakers" that this would be a reasonable change to this specific accreditation requirement.

ASMIRT seeks to understand how the 'Recognised Countries List' was created? The rationale behind removing South Africa is clearly articulated and supports the protection of patients. The same rationale is applied to Hong Kong, Malaysia and Singapore. Changes to the recognised countries list by removing South Africa is a welcome change to improve consistency of requirements between agencies and has sound rationale.

ASMIRT expresses concern with exemptions being granted to undertake 'supervised practice.' If the English Language Skills of the practitioner are not high enough to meet the registration standards, then how will a period of supervised practice assist? ASMIRT feels that it is not appropriate for a supervisor to be responsible for 'qualified practitioners' who have language barriers.

**5. Is it helpful to include examples in the definitions section of the ELS standard for example those included in the Full-time equivalent definition or would the examples be better placed in the supporting material (for example in Frequently Asked Questions)? Why or why not?**

ASMIRT feel that the examples within the supporting material are helpful, as they reinforce the messaging of the content.

6. The current ELS registration standards allow applicants to combine test results from two sittings within six months subject to certain requirements as set out within the respective National Boards' ELS registration standards. The revised ELS standard is proposing to change the time period for accepting test results from two test sittings to 12 months.

**Is the proposed change to the time period for accepting test results, from two test sittings from a maximum of six months to 12 months, workable? Why or why not?**

ASMIRT understands that it is difficult for some applicants who are residing overseas to undertake these English examinations as they are not run regularly in some countries. The 12-month period will provide time to book in to an examination venue and provide the applicant opportunity to study for their examinations. ASMIRT also suggests that information is provided with respect to what the applicant is required to do, or options that the applicant has, if there are two consecutive test scores that do not meet the ELS.

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

ASMIRT highlights the need for consistency between the requirement for registration and the requirements for migration. This needs to be made clear in the ELS standard.

ASMIRT have seen applicants who have undertaken two years secondary education in Australia, then four years tertiary education and subsequently provide an English language test score that does not meet the ESL standard for registration, however, are still accepted for registration.

8. The proposed draft standard sets out the currently accepted test types and modalities and provides that National Boards could approve additional test types and modalities if satisfied that these tests meet the requirements of a high stakes test for the purpose of registration. Information about any additional tests approved by National Boards would be published on the Ahpra website

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

ASMIRT highlights the need for consistency between the requirement for registration and the requirements for migration. There are only certain test types accepted for the purposes of skills assessments for migration. As such ASMIRT cautions against accepting a modality or test as suitable without collaborating with gazetted assessing authorities.

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

10. **Would the proposed changes to the ELS pathways result in any adverse cost implications for practitioners, patients/clients/consumers or other stakeholders? If yes, please describe.**

ASMIRT highlights the need for consistency between the requirement for registration and the requirements for migration. English language requirements for the purposes of migration may be different to that for registration.

<p>ASMIRT appreciates that the time provided for presenting a second test result will be extended to 12 months. In the situation where the second test score does not reach the required level, how many consecutive test scores will be acceptable?</p>
<p><b>11. Would the proposed changes to the ELS pathways result in any potential negative or unintended effects? If so, please describe them.</b></p>
<p>NIL</p>
<p><b>12. Would the proposed changes to the ELS standards result in any potential negative or unintended effects for people vulnerable to harm<sup>1</sup> in the community? If so, please describe them.</b></p>
<p>NIL</p>
<p><b>13. Would the proposed changes to the ELS standards result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples? If so, please describe them.</b></p>
<p>NIL</p>
<p><b>Do you have any other feedback about the ELS standards?</b></p>
<p>ASMIRT supports research and the use of evidence-based practice. In this situation, ASMIRT seeks clarification on how bias is accounted for when the “Language Testing Research Centre University of Melbourne” conducted the Literature Review? Given that it clearly states that it “reflects the views of the researchers from an academic perspective based on the literature and benchmarking only”, it is not clear how bias is controlled</p> <p>Again, ASMIRT also seeks clarification on the statement “The appropriateness of standards in workplace settings can be examined by checking how well overseas-trained professionals who have already entered a workplace domain are coping with the language demands of the profession” currently assessed? How is bias addressed in such a study?</p> <p>ASMIRT are interested to see the data on the numbers of complaints received or incidents that have occurred and reported due to language barriers? ASMIRT seeks to understand whether this evidence has been incorporated into this document?</p>

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<sup>1</sup> Such as children, the aged, those living with disability, people who are the potential targets of family and domestic violence