

English language skills registration standard review - submission template

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

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

Do you want your responses to be published?

☒ Yes I want my responses to be published

☐ No I do not want my responses to be published

Name: [REDACTED]

Organisation: [REDACTED] Optometry Australia

Contact email: [REDACTED]

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

Yes the proposed revised ELS seems clear, relevant and workable.

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

We are happy to see the addition of an allowable break in the advanced education pathway and the removal of the requirement for this to be continuous. We would ask for consideration for a small tweak to the wording as per below.

Currently the proposed revision lists:

"To qualify for this pathway, you have carried out and successfully completed at least six years in total of (full-time equivalent) education taught and assessed solely in English in a recognised country which includes: a. your qualifications, and b. advanced education at a degree level (AQF level 7) or higher which requires students to read, write, listen to and speak English. **A maximum of two years break between your qualifications and advanced education will be accepted.** The last period of education must have been completed no more than two years before applying for registration".

We would suggest this is changed to "**A maximum of two years break in this period of obtaining your qualification and the advanced education will be accepted**".

The reasoning for this request is that many potential applicants have children at this period in their life and often take 6-12 months off, which has previously ruled out many (otherwise safe)

applicants from being able to use this pathway. If AHPRA considers a two year break between the periods of education acceptable, then logically a pause of the same duration elsewhere in the period carries identical (low) risk.

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?

Yes.

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

It is proposed to name the four pathways as follows:

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

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

The proposed re-ordering and new names make sense.

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

It would be helpful to provide additional clarity without needing to refer to an additional document. The potential downside is of course it makes the standard longer. If added as pop out boxes however they would be easy to skip over if additional clarification not required.

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?

Yes. We would support this change as it provides additional flexibility for applicants without adding any significant risk for the regulator. Some applicants have noted difficulty in being able to take the tests on dates offered by providers (or difficulty if they miss an test date due to illness etc) and a greater time window would provide more flexibility in being able to take a second test.

It should be noted that extending this time window would also theoretically allow those applicants who's English skills are only borderline a greater chance at being able to combine pass results from multiple exams (which could be considered increasing risk compared to the current six month window).

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

We understand the need to make the standard as simple as possible and that it cannot cover every possible scenario. However, a situation that has been flagged to us on quite a few occasions is where an applicant has completed all of their primary and secondary schooling at expat / international schools in unrecognised countries where 100% of classes are taught in English. We have seen that there is currently no flexibility for these applicants but flag this for consideration.

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?

Cost should not be prohibitive.

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.

No significant cost implications.

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

Unlikely.

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

Unlikely.

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.

Unlikely.

Do you have any other feedback about the ELS standards?

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