
1. Introduction

The Pharmacists Board of Queensland ('the Board') welcomes the opportunity to respond to the Consultation Paper issued by the Pharmacy Board of Australia ('PBA') on 27 October 2009. The Board, with the assistance of the Office of Health Practitioner Registration Boards, has reviewed the PBA proposals together with those made by the other national boards.

That review has identified specific issues with the standard proposed by the PBA and general issues with the standards as proposed by all of the national boards. Both specific and general issues will be addressed in the following sections of this submission.

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3. English Language Standard

The Board wishes to raise a number of matters in regard to the proposed English Language Standard.

First, the definition of 'international student' is problematic. The standard as proposed does not provide adequate guidance to an applicant, or a registration officer, as to the requirements for international students to provide evidence of secondary education in English with their application. In this regard, it relies on self identification by the applicant in relation to their secondary education, and if they do not identify as an international student, they are automatically exempt from the requirements of the standard. However, the registration officer assessing the application will not be able to determine if documentation was not provided because they did not fall within the definition of 'international student', or because they failed to comply with the application requirements. This will mean follow up will be required in every instance resulting in additional costs and delays to the registration process.

There are two options available to address this issue as follows:

1. Define an 'international student' as 'a person who completed their secondary education outside of Australia' while concurrently requiring all applicants to state in the application form where they undertook secondary education; or
2. Require every applicant to provide evidence of their secondary education as a component of the application.

Option 1 is preferred as it is more cost effective and the Board will be able to rely on the false and misleading information provisions rather than seek evidence from every applicant.

Second, the inclusion of countries under exemption 1(a) of the standard is supported. However, the exemption could be strengthened by clarifying that the listed countries apply to

both the secondary education and the tertiary qualification components and by deleting the following text at the end of the paragraph: ‘...where English is the native or first language.’

These amendments will make it clear which applicants are required to undertake an assessment and will remove any room for argument from persons educated in a country where English is one of the first languages.

Third, the English language requirements specify applicants must ‘submit evidence or arrange for evidence to be provided’. However, under note 7 the applicant is then obliged to make arrangements for test results to be provided directly to the Board by the testing authority. This internal inconsistency needs to be addressed and it is submitted that applicants be enabled to submit evidence on the basis that the Boards can directly confirm these results with the testing authority.

The PBA specifically seeks advice on 3 other items:

- There is capacity for a minimum English language requirement of 7 to be set as a requirement for accreditation of the University pharmacy programs and this is a matter for the accreditation provider to determine. The Board however supports an English Language skills requirement of 7.5 at application for registration (other than non-practising registrants and students);
- For clarity, the Board also recommends amendment to read “... a minimum score of 7.5 in the IELTS academic module, an overall pass in the OET with grades of A or B only in each of the four components or specified alternatives...”
- The Board has no information about the validity of PLAB or NZREX for the assessment of English language competence of pharmacists and on that basis does not support the inclusion of these assessments as alternatives to the required IELTS or OET score.

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and should clearly communicate the requirements to all those who must comply.

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FREEDOM OF INFORMATION ACT 1982 (Cth)

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