

20 October 2014

**RE: Public consultation:
Review of *English language skills registration standard***

To the Boards for consideration,

I write on behalf of my constituent Mrs [REDACTED] of [REDACTED] in South Australia. Mrs [REDACTED] wishes to participate in the public consultation of the *Review of English language skills registration standard*, including input into questions for consideration 1,4,7 & 9.

Questions for consideration

1. From your perspective, how is the current registration standard working?

Mrs [REDACTED] believes the current registration standard is unfair and needs amendment.

For your background information, **Mrs [REDACTED] is an Australian born citizen, English is her first language, she was a domestic student and she has lived in Australia for a total of 31 years.** She lived overseas for a period of 6 years and completed high school whilst overseas. **Mrs [REDACTED] does not currently qualify as meeting the English language skills standard in its current form.**

Mrs [REDACTED] successfully completed her Diploma of Nursing amongst other courses and qualifications, with excellent performance reviews specifically relating to her communication skills, from her time during work placement. Despite this, she does not qualify under the current standard.

Mrs [REDACTED] was born in Australia on [REDACTED]. She lived overseas from the age of 12 to the age of 18 before returning to Australia. Furthermore, during her time overseas, English was one of the core topics required for her to complete her high school degree, however the country she lived in is not a recognized country under the current standard.

Mrs [REDACTED] has gained many qualifications and certificates, including;

- Diploma Enrolled Nursing;
- NAATI – Paraprofessional Interpreter between English and Serbian languages (both language directions);
- Certificate III Pathology Specimen Collection;
- First Aid Certificate;
- Course in Automated External Defibrillation (CPR) Certificate;
- Child-Safe Environments Reporting Child Abuse and Neglect Training;
- Many other various certificates in the medical field.

Furthermore, Mrs [REDACTED] received glowing reviews from assessors during her time on placement for the Diploma of Nursing, including specifically commendation of her communication skills and ability to understand tasks.

Mrs [REDACTED] feels that these numerous qualifications and reviews, along with being an Australian born citizen and having lived in Australia for a total of 31 years, should qualify her under the *English language skills registration standard*.

Mrs [REDACTED] feels discriminated against because of having studied overseas for a period of 6 years more than 19 years ago.

Furthermore, Mrs [REDACTED] undertook placement during her Diploma of Nursing where she performed Enrolled Nurse duties and received many commendations of her work, despite not having completed an English language proficiency test first.

Mrs [REDACTED] is not eligible for the Assessment Subsidy for Overseas Trained Professionals Program (ASDOT) because she completed her Diploma in Australia and not overseas, and feels this is also unfair because she does not receive financial assistance from ASDOT to participate in the OET English language test, however she is still expected to complete the same requirements as international students.

Mrs [REDACTED] feels this process has put a great amount of emotional and financial stress on her and her family as it has been over 12 months since she has completed her Diploma of Nursing.

4. Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?

Mrs [REDACTED] believes that whilst the AHPRA Board allows for a person to apply for an exemption to the English standard, she does not know of any evidence showing the Board exercise this ability. The Board should have the ability to, and exercise the ability to, use discretion in such cases.

7. Is there any content that needs to be changed or deleted in the revised draft registration standard?

Mrs [REDACTED] supports the Boards consideration to a number of options in developing the proposal. Under the Review of *English language skills registration standard* Mrs [REDACTED] supports:

Option 2 – Proposed revised standard

The National Boards commissioned research on English language skills. This research has helped inform the development of a revised English language skills registration standard that is largely common across the 13 National Boards participating in this consultation. A summary of the research is attached. National Boards have considered in the context of historical approaches, experience with the current regulatory position and the approaches of

comparator jurisdictions. The proposed revised standard provides more options for applicants to demonstrate their English language skills. It extends the period for which test results remain valid and provides more flexibility for applicants to count test results from more than one sitting in certain circumstances, while maintaining an appropriate focus on public safety.

Preferred option

The National Boards prefer Option 2.

Specifically, Mrs [REDACTED] supports the following change in Option 2:

OR

3. Accreditation by the National Accreditation Authority for Translators and Interpreters (NAATI) for translating and/or interpreting in English.

8. Is there anything missing that needs to be added to the revised draft registration standard?

Mrs [REDACTED] requests that the below change in Option 2 also apply to the Nursing and Midwifery category, instead of the current and proposed 5 years:

What must I do?

If you are applying for initial registration you must demonstrate English language competency in one of the following ways:

1. A combination of secondary education and tertiary qualifications, when you have undertaken and satisfactorily completed:

a. at least two years of your secondary education that was taught and assessed solely in English in one of the recognised countries (listed in the Definitions section of this standard); and

b. tertiary qualifications in the relevant professional discipline that were taught and assessed solely in English in one of the recognised countries.

Mrs [REDACTED] wishes to thank you for the opportunity to participate in this review and for your consideration.

Yours sincerely



Amanda Rishworth MP
Federal Member for Kingston