

Australian and New Zealand Podiatry Accreditation Council (ANZPAC) response to public consultation paper on the review of English language skills registration standard

ANZPAC welcomes the opportunity to provide feedback on the proposed amendments to the *English language skills registration standard*.

Expanding the list of recognised countries

ANZPAC notes the National Boards' recommendation to expand the list of recognised countries to recognise education in English from other countries, such as Hong Kong, Singapore and Malaysia.

It is important to note that the list issued by the Department of Immigration and Border Protection (DIBP) is based on passport holders of Canada, New Zealand, Republic of Ireland, United Kingdom and United States of America, as opposed to education in English. These applicants are assessed as having a level of English proficiency equivalent to an International English Language Testing System (IELTS) overall band score of 5.

AHPRA imposes a higher standard for registered health practitioners that by default, becomes the higher standard required by DIBP for those visa applicants. DIBP relies on the registration process to assess that an applicant meets the AHPRA English language skills registration standard. Therefore any changes to AHPRA requirements will become by default, the new DIBP standard for AHPRA registered visa applicants.

It is ANZPAC's view that the list of recognised countries should be consistent with those of the DIBP and that until such time as this changes, the list of recognised countries remain unchanged, with the recognition of South Africa to be phased out over time.

Accepting test results from multiple sittings

As noted on page 13 of the consultation document, IELTS was not designed to be a modular test. The four component modules are not offered as separate tests to be taken at different times. Rather, performance in the four skill areas is combined to provide a maximally reliable composite assessment of a candidate's overall language proficiency at a given point in time. Therefore, ANZPAC recommends that results continue to be obtained in a single sitting and that a candidate's **overall** IELTS band score form the basis of the assessment as opposed to results in individual bands.

In the absence of a definitive view in the research, by accepting the overall band score, AHPRA would provide a fairer outcome to candidates and obtain a more accurate indication of English language ability.

As a real life example, we have a candidate with scores of 7.5, 8.0, 6.5 and 7.5 with an overall band score of 7.5 (rated as a good to very good user of English) who currently does not meet the registration standard as they did not achieve 7.0 in one component of the assessment and therefore cannot proceed with their skills assessment nor registration.

Given that the developers of the IELTS system emphasise the importance of an assessment based on the **combined composite assessment** result for the most accurate indication of ability ANZPAC recommends that AHPRA adopt this model.

In terms of maximum number of sittings permissible in any one year, this is a self-limiting criterion as there are a limited number of tests available each year. The cost of sitting an exam is also significant and therefore also self-limiting. Given this, it does not seem necessary to impose a cap on the number of sittings in one year. If a candidate achieves the required result, the number of attempts is irrelevant to registration or skills assessment.

Recommendation

ANZPAC provides general support for the provision of more applicants to demonstrate their English language by accepting overall band scores rather than individual band scores. ANZPAC believes that AHPRA should align English language exemptions with the DIBP rather than by expanding the list of recognised countries.