

Mr Martin Fletcher
Chief Executive Officer,
Australian Health Practitioner Regulation Agency
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Dear Mr Fletcher

Re: Consultation regarding Criminal History and English Language Registration Standards

Criminal History

With respect to the existing criminal history registration standard, the Australian Private Hospitals Association has no concerns to raise. Continuance of the existing standard is supported.

English Language Skills Registration Standards

APHA is of the view that countries recognised for exemptions from English language testing should be consistent with the countries recognised by the Department of Immigration and Citizenship. Consequently the APHA does not support the recognition of additional countries for exemption purposes at this time unless they are also recognised by the Department of Immigration and Citizenship.

With regard to questions 4 and 5 which relate to the acceptance of test results, the APHA reserves comment on the technical details of the tests concerned. In principle, there would seem to be little value in implementing a policy which is at variance from the requirements of the Department of Immigration and Citizenship. At the same time, the APHA notes that it is common for professional accreditation programs to accept the results of tests and exams (eg tests of professional skills) that are passed over multiple sittings.

Yours sincerely



for Michael Roff
CHIEF EXECUTIVE OFFICER
20 December 2013