

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

Responses to: *English language skills registration standard*

To: standard.consultation@ahpra.gov.au

From: [REDACTED]

Dear , AHPRA

My comments are as an interested individual, not on behalf of [REDACTED]. Please see the comments below.

Yours sincerely

Brian May PhD

1. The International English Language Testing System (IELTS) requirement of 7

The requirement that an applicant achieve a minimum of 7 on each of the four IELTS components is onerous and there appears that there is no convincing evidence to support this concept. It is frequently the case that a particular person will achieve a higher result in certain skills areas than others. Communication is typically a global process not simply a sum of writing, plus listening etc. For this reason, for many years language tests have aimed at global scores. Low scores in a particular component may be indicative of a deficit but a range of sub-scores across skills is normal and to be expected. Any language level policy should focus on the person's overall skill.

By selecting IELTS level 7, AHPRA has set a high bar. A person scoring an average of 6.5 to 7 is expected to be able to undertake an academic course that uses English as the medium of instruction. By specifying 7 for each skill, this already high bar is further raised, since applicants who can achieve 7.5 or higher in reading may score 6.5 in another skill. As a result they may not be able to achieve registration despite having an English level of an academically acceptable standard.

How this requirement benefits the public remains unexplained. There appears to be no evidence that a person who scores 6.5 in writing but 7.5 in reading, and 7 on average, presents a threat to public safety.

Specifying subscale scores appears to have no clear justification in terms of public health and safety, while it places applicants in the invidious position of having their employment prospects depend on a set of 4 scores. Moreover, it leads to the inconsistency that graduates of a tertiary level course which they were allowed to enter on the basis of an average score of 7, cannot enter the profession for which they have trained. Such an anomaly indicates that the current policy:

- Is not the best option for protecting the public;
- Results in unnecessary restriction on entry to the professions;
- Imposes unnecessary costs on qualified professionals.

Recommendations:

1. That an average score be used as the criterion. In the health care professions, no single skill dominates. Level 7 is the level at which a person can be accepted into a linguistically demanding tertiary course, so an average score of 7 is a justifiable criterion.
2. In order to pick up individual that have highly imbalanced linguistic skill sets, a minimum of 6 in all 4 skills should be specified since level 6 is indicative of a level insufficient for tertiary level study.
3. By setting an average score of 7, as the criterion, the need for an applicant to sit multiple tests is generally removed. The exception is the unlikely circumstance of a person who scores above 7 on average but 6 on one skill. In such a case the person should be able to re-sit the examination without restriction.

2. Exemptions to the English test:

The current exemptions from the English language test requirement are too restrictive. In the current policy “**Extended studies undertaken solely in English, when you have undertaken and satisfactorily completed at least six years (full time equivalent) continuous education taught and assessed solely in English**” are required.

This means that a student who has come from a country not on the exemption list, who has achieved admission to an Australian tertiary course, and who has completed a full time four year degree taught and assessed in English will still have to undertake IELTS prior to registration.

Such a requirement is extremely onerous. It is also inconsistent particularly when the person has completed a course that has been approved by the Board to which they are applying.

Courses of study that have been approved by a Board all require that graduates be competent in the profession and this competency includes communication. Therefore, how can it be justifiable to require a graduate to be assessed on their communication ability yet again?

This policy it also contradictory in that the graduate has acquired capabilities specific to their profession that enable them to offer safe services to the public. So how can the addition of a generic English language assessment improve their safety?

This inconsistency indicates that the current policy:

- Is not the best option for protecting the public;
- Results in unnecessary restriction on entry to the professions;
- Imposes unnecessary costs on qualified professionals.

Recommendation:

1. That graduates of Board approved tertiary level courses that qualify them for admission to a profession, be exempt from further English tests. Provided that the courses is all taught and assessed in English and includes a clinical practicum that is assessed in English.
2. That the requirement of ‘continuous education’ be removed. There is no evidence that a leave of absence from a course should result in a risk to public from the granduate.