



ABN 98 729 112 634
Mr Tan Nguyen
Executive Director
PO Box 217
BULLEEN VIC 3105
AUSTRALIA

Australian Health Practitioner Regulation Agency
GPO Box 9958
Melbourne
VIC 3001
standard.consultation@ahpra.gov.au

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To whom it may concern,

I am writing on behalf of DEXCL with regards to the public consultation on the *Criminal History Registration Standard* and *English Language Skills Registration Standard*. Our organisation has expertise and practical experiences in dentistry.

Criminal History Registration Standard

DEXCL recommends the Boards continue to retain Option 1 – Status quo, with the following comments:

- The current standard is comprehensive, plain language, easily interpretable and implementable by health practitioners.
- To date, there have been no unintended consequences arising from the existing standard in Victoria.
- The content of the registration standard is clear, coherent and consistent with previous standards prior to National Law.
- The registration standard does not need to be amended.
- DEXCL recognises that the registration standard should include other activities that may involve community interactions that are not specifically related to health practice. For example, health promotion, health research etc. We recommend the Boards to consider a definition of 'health practice'.

English Language Skills Registration Standard

DEXCL recommends the Boards consider implementing the proposed Option 2 – Proposed revised standard, with the following comments:

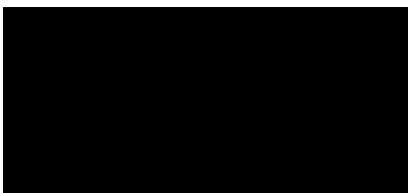
- The current registration standard may not be consistent with the Department of Immigration and Border Protection. International graduates with a Bachelor or Doctoral degree from an Australian approved university leading to

registration as a dental practitioner under National Law have been disadvantaged in the past by not being exempt from additional English language competency testing. We are unaware if these issues remain since the commencement of National Law.

- We are concerned any exemption as a result of Citizenship from countries where the native language is English listed in the revised standard is considered to be discriminatory. It is also recognised that the public expects that all health practitioners be competent in excellent communication skills, particularly regarding discussions of informed consent. DEXCL recommends exemptions should be considered where health practitioners provide evidence of recent health practice of at least two (2) years in a country where the native language is English prior to registration. We cannot provide comment on South Africa as an exemption country to be phased out over time.
- We cannot comment on any additional evidence to support other countries being recognised for an exemption from English language competency testing due to our lack of expertise in this area.
- The National Boards should consider test results close to and slightly below the current standard for evidence of English language competency with due consideration between the length of time between tests and the consistency of the scores achieved.
- The National Board should consider test results from more than one test to support the applicants' English language competency.
- The draft revised registration standard is clear, comprehensive and is more flexible than the current standard.
- DEXCL has no other further comments regarding the proposed revised standard.

We appreciate the Boards intention to improve both standards by invitation for public consultations.

Yours sincerely,



Mr Tan Nguyen
Oral Health Therapist
BOraHlth (Mel)
DEXCL
Executive Director