



The Royal Australasian
College of Physicians

Office of the Dean

Professor Richard Doherty
PO Box 7210, St Kilda Rd,
Victoria, Australia 8004

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Mr Martin Fletcher
CEO, AHPRA

by email: standard.consult@ahpra.gov.au

Dear Mr Fletcher

RE: AHPRA consultation on Review of Criminal history registration standard and English language skills registration standard

Thank you for the opportunity to comment on the proposed review of these standards.

Regarding the proposed review of the *Criminal history registration standard*, The Royal Australasian College of Physicians (RACP) concurs with the National Boards' preference for Option 1, continuing with the existing standard.

Regarding the proposed review of the *English language skills registration standard*, the College would like to urge caution in any approach to a more relaxed standard of English language skills for medical practitioners, even if there is a case for reducing the standard for other health practitioners.

Medical practice relies heavily on effective two-way spoken communications between doctor and patient. The capacity of the practitioner to explain complex issues to patients is of paramount importance. The practitioner's ability to interpret the communication of the patient is also crucial to effective diagnosis and care. Although there needs to be appropriate communication by practitioners in other professions, the issue of obtaining informed consent by a medical practitioner remains a critical issue for which the clarity and precision of communication is a central component.

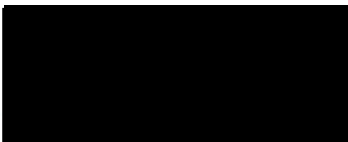
Medical practice in Australia involves a high proportion of interactions with people for whom English is not a first or even second language. The OET and IELTS work on the basis of inserting a non-English speaker into an English language environment. The reality in Australia at the moment is that English is often the only common language between two people with different first languages. In this situation, the requirement for clarity and precision in communication is increased and it is not clear that the current English language standards take this into account adequately.

The College's position on this issue is informed by its experience in assessing overseas trained physicians for specialist registration in Australia. We have had anecdotal complaints about the standard of English spoken by some of the overseas trained specialists in peer review. In many cases it seems that communication issues relate more to cultural communication styles and accent rather than actual English ability. Most overseas trained physicians from non-English-speaking backgrounds pass successfully through peer review without language being an issue. However, we do know that communication issues are frequently high on the list of problems with overseas trained physicians who encounter problems during peer review. Although we do not have data on the likely effect of accepting a lower standard of English language skill, we remain concerned that lowering the standard requirement might affect communication during clinical consultations and thus patient outcomes.

The College has seen the Australian Medical Council's response to your consultation document, and generally concurs with its views, including the observation that "language proficiency is not itself evidence of communications ability ... in the longer term, alternative options for assessing or establishing communication skills and ability should also be explored as a requirement for registration." The AMC's comments about the difficulties of allowing candidates to meet the standard through multiple attempts of the English language proficiency test are also worthy of serious consideration.

Considering the importance of English language skills to patient safety, there is a case to be made for maintaining the standards at the current level until there are more data on the key issues. The College would accept AHPRA relaxing the multiple test rule for OET candidates who were below but close to the mark in one area of a primary test. The IELTS test is not constructed to allow this, but AHPRA may be able to establish a workable compromise.

Yours sincerely



Richard Doherty
Dean