



## **RANZCR Submission to the National Boards Consultation on Review of Criminal history and English language skills registration standards**

The Royal Australian and New Zealand College of Radiologists (RANZCR) is the leading professional organisation for the promotion of the sciences and practice of the medical specialities of Radiology (Diagnostic and Interventional) and Radiation Oncology in Australia and New Zealand.

RANZCR is responsible for assessing international radiology and radiation oncology medical graduate specialists (IMGs) and specialists-in-training via three separate pathways:

- Specialist Assessment (Fellowship of the College)
- Assessment for suitability for employment in an area of need (AoN) position
- Short term specialist specified training

### **Criminal History registration standard**

#### **Comments**

The standard and content is clear, concise and relevant.

We consider that if a health practitioner commits an offence not necessarily related to the health practice but relates to an individual's moral character, there should still be a significant weighting placed on that offence irrespective of whether it directly affects patient health care (e.g. drink driving charge, personal negligence, offense against minors or other inappropriate behaviour).

### **English language skills registration standard**

#### **RANZCR Responses to Questions for Consideration**

The Boards are inviting feedback on the following questions:

#### **1. From your perspective, how is the current registration standard working?**

The current standard is mostly appropriate for the field of radiology/radiation oncology, however it does not take into account people who have worked in an English environment for a considerable period of time. Also, our experience has been that a 2 year time frame for the validity of the English test results was tight for some IMGs applying for specialist recognition especially if they were located overseas or if they encountered unexpected delays in attending the College assessment.

#### **2. Should the countries recognised in the standard be consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing? If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?**

Whilst in principle we are in agreement that the standard should be consistent with those countries recognised by DIAC, we believe that South Africa should remain as one of the **recognised countries** for the English language exemption.

#### **3. Is there any evidence to assist National Boards to assess whether there are any additional countries that should be recognised in their English language skills registration standard?**

RANZCR does not have further evidence to assist the National Boards at this stage.

**4. Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?**

RANZCR would like to maintain the current level for the medical profession (also see point 5).

**5. Should National Boards accept results from more than one sitting or is there a better way to address this issue, such as the approaches described above?**

In principle we support a modular approach to English language proficiency, where an applicant is allowed to achieve the minimum score in two (2) sittings (with one extra chance) within a 12 month period, if the original score was a minimum of 6 or more.

**6. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?**

The draft revised standard is more helpful, relevant and well-structured than the existing standard.

**7. Is there any content that needs to be changed or deleted in the revised draft registration standard?**

None to mention at this stage.

**8. Is there anything missing that needs to be added to the revised draft registration standard?**

None to mention at this stage.

**9. Do you have any other comments on the revised registration draft standard?**

Extending the validity period of the test results from 2 to 3 years should not result in a compromise of English language proficiency. However we feel that there should be **continuous** employment as a registered health practitioner.....in one of the recognised countries (page 2 of the revised standard under **Test results** heading) -

- o *more than three years prior to applying for registration and you have actively maintained continuous employment as a registered health practitioner in the <xx> profession using English as the primary language of practice in one of the recognised countries since the test result was obtained;*

Thank you for the opportunity to provide input to the National Boards Consultation on the criminal history registration standard and English language skills registration standard. Please contact Susan Nicols at [REDACTED] in relation to this submission.

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Chief Executive Officer

**Dr Martin Marshall**  
IMG Committee Chair