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Cc: [REDACTED]
Subject: Submission for Nursing and Midwifery Board of Australia: Public consultation on common registration standards
Date: Thursday, 19 December 2013 2:36:31 PM
Attachments: [image001.png](#)
[image002.png](#)

TO WHOM IT MAY CONCERN

Please find below brief responses to the questions posed in relation to the Nursing and Midwifery Board of Australia: Public consultation on common registration standards.

Criminal History

1. From your perspective, how is the current registration standard working?
 - We are happy with current standard and do not have any issues to raise.
2. Are there any state or territory-specific issues or impacts arising from applying the existing standard that you would like to raise with the Boards?
 - Not that we are aware of.
3. Is the content of the registration standard helpful, clear and relevant?
 - Yes. It provides guidance with the ability to judge each case on its own merits.
4. Is there any content that needs to be changed or deleted in the registration standard?
 - Not in our view.
5. Is there anything missing that needs to be added to the registration standard?
 - Not in our view
6. Do you have any other comments on the registration standard?
 - Our preference would be to remain with current standard.

English Language

1. From your perspective, how is the current registration standard working?
 - There seems to be a large number of graduating students who have difficulty in meeting the current standard due to the fact that minimum requirements for entry into a tertiary program is lower than that required for registration. We are happy with the current level of English requirement for nursing and midwifery registration.
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?
 - This would seem to make sense.

If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?

We are uncertain for the current situation regarding this so cannot comment.

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?
 - No comment
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?
 - As a general rule, we agree with the maintenance of common standards for all applications, however, the Boards should be able to examine particular cases holistically taken a range of issues into account.
 - We would support modularised testing as long as the test is designed to be so.
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?
 - Yes, however, there may need to be some time frame restrictions or other limiting factors.
6. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?
 - The following is confusing:
 - the IELTS examination (academic module) with a minimum score of seven in each of the four components (listening, reading, writing and speaking). Results from (Options for consultation) [one] or [up to three] test sittings in a 12 month period may be used, only if all scores are 6.0 or above.
7. Is there any content that needs to be changed or deleted in the revised draft registration standard?
 - There are so many options that it can be confusing – would be good to have a clearer way of representing the options (eg flowchart, grid)
8. Is there anything missing that needs to be added to the revised draft registration standard?
 - Not as far as we can tell.
9. Do you have any other comments on the revised registration draft standard?

Regards

Steve

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