DRAFT SUBMISSION TO BOARD FOR CONSIDERATION.

- IF there is any "standard" of English level testing that is required, It should be ACROSS the BOARD, and EVERYONE who is applying to register/re-register, MUST and SHOULD pass those tests. Certainly linking up the "proposed" efficiency of English levels and a person's capacity, with the Department of IMMIGRATION, and the selected English speaking countries, does not make any sense what so ever, and is discriminatory to say the least. These selected countries is all a joke and the decision makers should get real, because we are geographically in Asia, and moving forward into time, would have to base their criteria with this understanding and work around those parameters.
- The "SELECTED COUNTRIES" ... WHY THESE COUNTRIES/ ON WHAT BASIS...
- Why "doubts" about South Africa(adding them at a later stage and now wanting to remove them)???
- Clearly, common sense will show, that English is extremely widely spoken in most Asian countries, and with effluence and clarity.
- Have a fixed type of testing (either OET or IELTS) as these two types of testing are starkly different (as is also known by the boards). These tests also are a matter of luck, where a person might pass in one unit and fail in the other 3 units on one attempt, and fail in the one they passed in, and pass in the ones they failed in, on the next attempt. There is an element of LUCK and is ABSOLUTELY no indication of the proficient levels of the person. What's the point in considering "passed" units on multiple attempts, and making the person "pass" all units in one go, or even separately? Neither makes any sense.
- OET has advised that it suggests that it will be valid to consider test results from multiple sittings." It has been quoted by them in this consultation Review. Research by THE BOARD'S own Lesleyanne Hawthorne has no conclusive evidence to the current requirement to pass all four subtests in a single sitting. Please explain???

The IELTS/OET testing companies are private businesses, with a vested interest in their profit margins, so maybe an authority with no vested interest should be considered to keep it genuine and real and free from corruption. The very fact they are used to access levels of English for selection criteria like visas, registrations, etc.is questionable as there is no accountability that is required on their part to keep these programmes in the best intentions of what they were intended to in the first place.

 For all existing registered and enrolled nurses (the level of English requirement would have to be wavered, as it means NOTHING.(Certainly does not mean they are proficient in English) based on the country they came from, the connection with Immigration., or whatever guidelines have been used so far. Just hope and pray they can have working functional English with the staff/doctors and patients.

and

For all new students for Enrolled Nursing and Registered Nursing:
A PRE-ADMISSION criteria (before they are accepted into the course) of
English Testing, across the whole range of countries etc, EVERYONE) should
be applied. Make the REQUIREMENT CRITERIA very well structured, well
before the student even begins day one of her studies.

eg: a student who migrated from China, and has spent 2 years in school here (year 12) is deemed to be satisfactory and NO English testing required. Now, my gut feel tells me, that this person (as an example) will fail an IELTS or OET test if it was given to him/her.

I quote from APRHA: "

 However on application, applicants are required to provide documentary evidence that their secondary education and nursing or midwifery education were completed in Australia. Evidence of secondary education may include documentation that states the name of the secondary education provider, the years in which an applicant attended their secondary education and the final year of secondary education completed. Evidence may include but is not limited to a school leaving certificate or a Year 12 certificate" ...END QUOTE.

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How do you justify this? mmmmm

- ALL STANDARDS should be set as Criteria, for entry level into selected courses and programmes. There is no point, where people/students have been selected(sometimes by a Federal Government fully funded programme), spent 2 years or more in study, pass the course with ease, only to find that they will have to "PROVE" their English levels, after all their effort. What is the substance given to these courses, if they are not satisfactory enough?
- The BOARD(a joke) keeps making policy on the run, and changing the goal posts and parameters which is a disgrace. Now they have requested a similar Public Consultation Paper in 2010 and asked the same questions from the public. They had 260 submissions. What was the "outcome" of that review from 2010? Has it been published anywhere? If so, where????

 The BOARD has themselves identified there are "UNDERLYING" issues in this discriminatory set up, and have again called for "public submissions"

Why is this matter raising its ugly head, and why does the BOARD need public help. Are they not capable to make these decisions with some clarity and vision?

The Board??? The Board are like the faceless men, always HIDING behind someone else"s portfolio "OTHER BOARDS", and decisions made by other departments etc. APRAH passes the buck to "THE BOARD" saying they are only an "ADMINISTRATIVE" body, and carries out policy set by the BOARD. Yet, where is this board? Who does the buck stop with? Complaints directed to the Ombudsman have ended up absolutely nowhere, because of the "ivory tower" syndrome with "THE BOARD".

This submission is extremely worthy of being addressed with every point mentioned, and the board should hang their head in shame, just for not getting this important matter right.

We have been fighting this issue for the last two years, written to APRAH(many times), The Ombudsman has a current file running(since July 2013) and they will advise their actions when their office is capable of doing so(and I quote:..." as it is currently not properly staffed and capable, due to government funding"...

This matter has been raised by me with:

The last Labour Fedral Health Ministers (Tanya Plibersek, and Jacinta Colins) and minister for aged care.

The Last Federal opposition health minister. (he's licking his lips now)

The current Health Minister Peter Sutton(gladly said THE BOARD IS AN INDEPENDENT BODY, and his office will not get involved"

The current State minister for health(Kim Haymes)...nothing done. The current Opposition member for health(WA), Roger Cook who has been kind enough to look at this dogs breakfast, with limited results.

We will continue our fight to see that we have justice and equality in this field, and are now considering a class action situation with legal professionals, and are prepared to see this matter all the way, even in court.

Wake up "THE BOARD", and sack yourselves. Get some wise people with a vision, who are capable of making decisions that see the nursing profession move ahead and thrive well into the next decades, and stop having policy on the run.

I certainly wish there could be an independent enquiry into the decisions made and the legality of them bordering along the lines of discrimination.