

From: Best, Mark [mailto:[mailto:mark.best@qld.gov.au](#)]
Sent: Friday, 10 December 2010 5:27 PM
To: Kathleen Almond
Subject: Registration Standard for English Language Skills

To: Kathleen Almond

Re: AHPRA English language skills registration standard

Dear Kathleen,

I welcome the opportunity to comment on the current consultation proposal to adopt a revised English language skills registration standard. I sincerely suggest the proposed changes are adopted and implemented with the greatest urgency.

I make these comments from the view point of an Australian, English-speaking citizen and undergraduate degree holder. I cannot imagine a more demoralising result of successfully completing a hard earned undergraduate degree course through the Australian tertiary education system than to not be **duly registered and have the ability to practice professionally**. Indeed, I would suggest that this would indeed be a most unfortunate and ridiculous situation. But it is my understanding that this is exactly the situation under existing registration regulation.

I believe that current registration requirements do not allow sufficient common sense to be applied by those undertaking assessment for registration. Current procedures appear overly narrow in scope and require urgent revision as there is apparently insufficient scope for the acceptance of *equivalent competency-based qualification*, leading to difficulties for new graduates being registered.

The lack of effectiveness in applying existing regulatory registration arrangements is clearly demonstrated by a recent case I am familiar with where an applicant for registration has *twice* been informed she was eligible for registration and *twice* been informed that she *is not* eligible for registration. I find this a most extraordinary situation and have empathy with the individual who has demonstrated the ability to obtain an undergraduate-level degree in the course of studies.

I am not familiar or clear on the due process and administrative rigour applied through the Queensland branch of your organisation; however I have witnessed results where this particular applicant has been left wondering if she will indeed bother to pursue a career in the medical sector. Indeed, whilst AHPRA is a newly amalgamated organisation, it should not be the case that this leads to muddled and confused administrative registration outcomes for new graduates, the very people who are required throughout a modern and competent medical sector.

Existing procedural requirements are overly narrow in scope and do not permit a logical approach to be taken. Candidates are forced to comply with a directive to show English competency under a range of variables including the completion of secondary studies assessed in English or complying with IELTS or OET testing regimes. Such scope would appear overly prescriptive and narrow.

This is clearly an unacceptable situation and one that could be *alleviated by quick adoption of the proposed standard.*

It is difficult to see why the current registration practices have been adopted and why it is the case that qualifying in a professionally appropriate undergraduate level degree *is not* recognised as sufficient indication that a candidate seeking registration has not indeed satisfied requirements in areas of the English language including comprehension, verbal usage, reading and writing skills **and** their application given that **such skills are demonstrated repeatedly and to a high level throughout their respective course of study.**

With this in mind, I suggest that the proposed changes be adopted effective immediately. Please do not wait until after Christmas and have more lengthy consultation. Do it now!

Yours Sincerely,

Mark Best