

15 December 2010

Ms Alyson Smith  
Acting Executive Officer  
NMBA

Dear Ms Smith,

**Re: NMBA revised draft English language skills registration standard**

In November 2009, the ACMHN provided comments to the NMBA on the proposed registration standard for English Language Skills. In that submission we expressed our view that proficiency in spoken and written English language is vital for the competent practice of mental health nursing. High level communication skills are essential to establishing a therapeutic relationship which is at the core of mental health nursing. This remains our view and we are concerned that the current standard and the proposed revised standard do not ensure a mental health nurse has sufficiently proficiency for this purpose.

In addition, we make the following comments on the proposed revised standard:

1. The ACMHN believes that nurses working specifically in mental health settings require English language skills at an IELTS level 8 or OET equivalent.

As all nurses in Australia are eligible to practice in mental health settings, all applicants seeking initial registration should be able to demonstrate English language skills at an IELTS level 8 or OET equivalent.

Rationale: The development of a therapeutic relationship in mental health nursing requires the use of 'self'. The primary tool used by mental health nurses to do this, is their capacity to communicate with patients / clients about complex and uniquely individual subjects. Mental health nursing focuses on how people with mental health problems relate their inner world to the external world and as such, mental health nurses require a fluent understanding of the social, emotional and cultural meanings and the nuances of language.



2. The ACMHN has the following concerns about requirement 1. Applicants who have undertaken a course in nursing in specific countries where English is the primary language. Exempting applicants who have undertaken a course in nursing in specific countries where English is the primary language assumes that there has been an English Language entry requirement the same level as Australian courses

This deems those applicants as achieving the same level of English language skill at an ILETS level 7 or OET A or B by merely completing course and without any evidence of demonstrating English language skills within a clinical practice setting.

3. The ACMHN has the following concerns about requirement 4. Requirement 4a. does not guarantee that English has been used in the workplace. For example, the workplace in the US may use Spanish. Therefore the ACMHN would support the standard that Test Form be no more than two years old on application, and only if the applicant has been practising in an English speaking context to ensure ongoing English language competence.

Yours sincerely,

Kim Ryan  
CEO