

14 December 2010

Ms Anne Copeland  
Chair, Nursing and Midwifery Board of Australia  
PO Box 16085  
Collins Street West  
Melbourne Vic 8007

Dear Ms Copeland

**Re: English Language Skills Registration Standard**

Thank you for the opportunity to provide feedback on the revised draft English Language Skills Registration Standard released for consultation on 15 November 2010.

The Council of Deans of Nursing and Midwifery (ANZ) acknowledge that the current draft reflects the feedback provided on the initial standard, as well as comments provided in a recently completed, preliminary consultation process however, it is the Council's view that the current wording of the standard remains ambiguous and the requirement for attaining a score of 7 on the International English Language Test does not reflect the current entry score required of international students commencing studies in accredited Australian nursing programs.

With respect to the wording of the requirements detailed in the revised standard, I draw your attention to the following areas of ambiguity in particular:

- The new standard appears to indicate that any student who has completed an entry to nursing course that has been taught and assessed in English **MAY** be considered to have met the English requirement. Use of the word **may**, suggests to the reader that some may not qualify for registration yet no advice is provided as to how assessments will be conducted. Supplementary guidelines should be developed to ensure an equitable and transparent policy and process can be seen to exist.
- There is no mention of how long the nursing course has to be or whether that would mean that overseas qualified nurses who enrol and complete additional units in an Australian Bachelor of Nursing program in order to meet Australian registration standards would need to provide evidence of achieving a successful IELTS score of 7 based on the fact that they have completed all requirements of the BN. The previous requirement re this issue said that students had to have studied their course for at least 2 years of full time study in the relevant country. What if a student is given advanced standing and only studies one year in Australia?

The requirement for the "Head of School" to confirm that the applicant is safe to practice in a clinical setting is unclear. In this context, it could be assumed that this sentence intends to refer only as to whether the individual seeking registration meets English language

requirements. However, it could extend to other issues; for example, with Heads of School also being expected to comment on things such as physical/ or mental health issues, cognitive impairment and/or levels of support required for those registered with the various University disability service departments? Further clarification in the wording will assist in this regard. It is pertinent to reiterate here that Council would not necessarily be opposed to being required to report on such matters, given that such issues could be seen to potentially impinge on our role as educators of the RNs of the future, to 'protect the public'; however, Privacy and Disability legislation would have to be considered.

As the peak body representing nursing and midwifery education in Australia, the Council has conducted a survey of its members to ascertain the current English language requirements for students entering nursing and midwifery programs across Australia. Of the 34 universities who identified their entry requirement, less than 35% have set a score of 7 with even less requiring it across all four assessment areas. This finding would suggest that a period of grandfathering will be required to ensure that international students already enrolled in Australian nursing and midwifery programs and those commencing in 2011 are eligible for registration upon graduation. This, of course, may not be necessary should the interpretation that the new standard includes 'a student being deemed to meet the English requirement by a HoS'; be correct. It may be the case that should the standard read that another way that a student might meet English requirements could be that they: have an IELTS of 6.5 in all bands ON ENTRY; be assessed as competent in practice, including all areas of English literacy required of the role of RN (writing/note-taking, speaking and listening) PERHAPS for a course lasting a minimum of time (say, 2 years) then such need for grandfathering would be minimal.

The Council of Deans of Nursing and Midwifery (ANZ) appreciate the difficulties in achieving a consensus position on this issue with such a broad range of interested stakeholders. We remain committed in our support of the Board and as such, if we can be of assistance in further refining the standard then please do not hesitate to ask.

Yours sincerely

Professor Patrick Crookes  
Chair, Council of Deans of Nursing and Midwifery  
(Australia & New Zealand)