

From: Dwight, Robyn (AGD) [\[mailto:_____\]](#)
Sent: Thursday, 16 December 2010 10:11 AM
To: Kathleen Almond
Subject: AHPRA submission

Dear Ms Almond

Thank you for the opportunity to comment on the AHPRA draft 'Registration Standard for English Language Skills.'

As Commissioner for Equal Opportunity in SA I administer the *Equal Opportunity Act 1984* (SA) which includes race discrimination in employment, goods and services, accommodation, education, clubs and associations, sale of land and the granting of qualifications.

The Commission has received a number of enquiries and complaints over recent months relating to various health registration standards. These complaints focussed on standards that required anyone who completed their high school education in a language other than English to sit an English test before registration would be granted. This was regardless of whether their relevant tertiary studies had been in English.

I am pleased to note that the proposed AHPRA English language skills registration standard states that applicants who have completed their tertiary studies in English will not be required to sit the IELTS.

It is however unclear in the draft Standards what criteria were used for determining the list of countries where it is expected that the applicants "should meet this requirement" (para 3, page 2) of having completed their tertiary studies in English. It may be helpful to candidates for the standard to provide a short summary of the reasons why those countries are on the list, at the exclusion of others. I note that there are a number of countries where English is an official and primary language and where secondary and tertiary education is conducted in English - sometimes exclusively. Uganda is such an example. Not having information about the reasons why may leave some candidates with the perception that the countries listed exclude those with majority non-white Anglo-Saxon populations in spite of English being an official language (with the exception of South Africa).

Although forming this perception may not at all be accurate, it may be something that the Board considers worthwhile addressing so as to avoid any potential complaints of race bias or discrimination in the selection of countries.

Thank you for considering this submission.

If you would like to contact me regarding this submission please call on .. or email

[□ .](#)

Regards,

Robyn Dwight
Manager - Business and Community Programs
Equal Opportunity Commission - South Australia

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