

10 December 2010

2407/E

Ms Anne Morrison  
Executive Officer Nursing and Midwifery  
GPO Box 9958  
MELBOURNE VIC 3001

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Dear Ms Morrison

### **Registration standard for English language skills**

Royal College of Nursing, Australia (RCNA) welcomes the opportunity to provide feedback to the Nursing and Midwifery Board of Australia (NMBA) on the *English language skills registration standard* (the registration standard). RCNA appreciates NMBA's reflection and review of the registration standard in response to stakeholder advice that there were opportunities for improvement.

As the peak professional organisation for nurses in Australia, RCNA is pleased to provide the following feedback to inform this consultation from a nursing perspective.

#### **General Comments**

RCNA notes two issues for consideration by NMBA in the finalisation of the registration standard:

- RCNA suggests that the registration standard include reference to the Trans Tasman Mutual Recognition Agreement and the legislation in this regard.
- RCNA recommends that the registration standard include an explicit reference that applicants from any country not listed will not be considered to have met the English language skills registration standard without submitting suitable evidence to NMBA.

#### **Specific Comments**

The following recommendations seek to improve clarity within the registration standard, which is vital particularly in relation to guiding overseas applicants.

For purposes of clarity RCNA recommends the following inclusions and edits in the **Summary** section:

- The first sentence of the first paragraph should read: *All applicants seeking initial registration as a nurse **and/or** midwife must demonstrate English language **competence skills** at a level that ensures safe and competent care is delivered to the public.*
- The first sentence of the third paragraph should read: *The Board considers that applicants who have been taught **and** assessed in English in their tertiary, entry to practice nursing and/or midwifery education **program** in the countries listed here **must should** meet this requirement.*

Also for improved clarity, RCNA recommends the following changes to the **Scope of application** section:

- The first sentence should read: *This registration standard applies to all applicants seeking initial registration as a nurse and/or midwife in Australia, including applicants students holding student registration at the time of application.*

RCNA recommends the following to clarify the **Requirements** section of the registration standard:

- Point 4b should read: *...is a registered student who was required to provided an IELTS of 7 or equivalent at the commencement of his or her program of study and who has successfully completed the program of study in a full-time or part-time capacity in English, in a period that is greater than two (2) years.*
  - The last section of the above sentence is redundant as the information is already provided in the lead-in phrase.
- RCNA is concerned about the specifics surrounding IELTS test scores mentioned in points 2 and 4. The requirement of a minimum score of 7 on the IELTS examination will not necessarily marry with the scores required for university entrance. RCNA is advised that there are universities that accept scores of 6.5, 6, or even 5.5. RCNA suggests that this could have implications for students and the workforce, and that the education sector will need to be clear as to the expectations given to students upon their university entrance. There will need to be clarity around the fact that entrance into a university program may not lead to registration as a nurse and/or midwife if students do not meet the higher required IELTS score of 7.
  - Related to this point, RCNA seeks further detail and clarification around the use of 'may' in the lead-in to point 4, which says: *An IELTS (or approved equivalent) Test Report Form older than two years may be accepted as current if accompanied by proof that an applicant...*

RCNA appreciates inclusion in this consultation and would like to extend our ongoing support to progress the work of NMBA. Please do not hesitate to contact me in relation to this consultation or any other professional matter.

Sincerely



Debra Y Cerasa FRCNA  
Chief Executive Officer