

**From:** Angela Brannelly [\[mailto:\\_\\_\\_\\_\\_\]](mailto:)  
**Sent:** Wednesday, 8 December 2010 2:24 PM  
**To:** Kathleen Almond  
**Cc:** Colette Pethick  
**Subject:** RE: English language skills registration standard consultation phase 2

Dear Kathleen,  
Please find below comments from the NT NMBA:

Format issue:

'to practice' appears twice in the document. When following the word 'to' the spelling of practise is with the 's' not 'c'

Regarding content:

There is a lack of clarity, under scop of application, regarding IQNs and IQMs

- How does this assist in considering the following scenario – OS trained RN or RM, registers in an Australian jurisdiction, never practises in Australia, allows registration to lapse and seeks re-registration. Given the scope this person should be eligible for registration and exemption from English language test.
- If an overseas nurse has registration as an RN in Australia, then wants to apply for their overseas Midwifery qualifications to be assessed by the Board, do they need to resubmit all the English Language requirements? They would have previously done this to get initial registration as an RN
- The new draft has dropped the all mention of secondary schooling being in English as the threshold measure for requiring proof of IELTS at 7.0. This position is inconsistent with at least podiatry, psychology, and pharmacy. Instead, this new draft uses the criteria of "tertiary, entry to practice" education. There should not be a different and lesser stringent requirement than the other disciplines.

There is a lack of clarity regarding registered students:

- While the Scope states the Standard applies clause (a) suggests that as students are indeed a category of registration, that students are exempted. Furthermore, as they are "taught and assessed" in Australia (Requirement 1), all Registered Students are in fact deemed to meet the Standard by virtue of undertaking their entry to practice within Australia.

The Board suggests the policy should include, the Board reserves the right to require a registrant to undertake an English language test should it be deemed necessary to ensure English language proficiency.

Cheers  
Angela  
Chair NT NMBA

**Angela Brannelly**

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