

17 December 2013

Nursing and Midwifery Board of Australia

GPO Box 9958

Melbourne 3001

Austin Hospital

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Dear Sir/Madam,

Re: Public consultation: Review of Criminal history registration standard and English language skills registration standard

Submission submitted by: <i>Insert full name & title</i>	Ann Maree Keenan Executive Director of Ambulatory and Nursing Services
Organisation:	Austin Health Heidelberg, Victoria
Contact detail: <i>Insert phone and email details</i>	
Submission type: <i>Personal, on behalf of organisation or group – please specify</i>	On behalf of Austin Health
Can this submission be published on the Nursing and Midwifery Board of Australia website: yes or no	Yes

Criminal history registration standard

1	From your perspective, how is the current registration standard working?	We have no concerns with this registration standard. We think staying with status quo is appropriate
2	Are there any state or territory-specific issues or impacts arising from applying the existing standard that you would like to raise with the Boards?	No
3	Is the content of the registration standard helpful, clear and relevant?	Yes
4	Is there any content that needs to be changed or deleted in the registration standard?	No
5	Is there anything missing that needs to be added to the registration standard?	No
6	Is there anything missing that needs to be added to the registration standard?	No

English Language Skills Registration Standard

1	From your perspective, how is the current registration standard working?	From a health service perspective it seems to be working sufficiently. An English language test which relates to the profession would be preferred over a generic one.
2	Should the countries recognised in the standard be consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing?	Yes. It seems worthwhile to have a consistent approach.
3	If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?	Yes
4	Is there any evidence to assist National Boards to assess whether there are any additional countries that should be recognised in their English language skills registration standard?	No
5	Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?	If this was to occur a criteria would be required to guide how this would work.
6	Should National Boards accept results from more than one sitting or is there a better way to address this issue, such as the approaches described above?	Yes if quantified as per the draft consultation standard p. 16 of 26 "up to 3 tests within a 12 month period".
7	Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?	Yes. It seems easy and clear to read
8	Is there any content that needs to be changed or deleted in the revised draft registration standard?	Yes, in the draft consultation standard on the bottom of p. 15 of 26 "Extended studies undertaken solely in English, when you have undertaken and satisfactorily completed at least six years (full time equivalent) continuous education taught and assessed solely in English". <ol style="list-style-type: none"> 1. What does extended study mean? 2. At what level of education provider will this extended study be undertaken? 3. Does continuous study allow for a gap year?
9	Is there anything missing that needs to be added to the revised draft registration standard?	No
10	Do you have any other comments on the revised registration draft standard?	No

Yours Sincerely



Ann Maree Keenan

Executive Director of Ambulatory and Nursing Services