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18 December 2013

Australian Health Practitioners Regulation Agency GPO Box 9958 Melbourne VIC 3001

By Email: standardconsultation@ahpra.gov.au

Re: Public Consultation: Review of Criminal History & English Language Skills Registration Standards

Thank you for providing the Australian Dental Association Inc. (ADA) with the opportunity to provide feedback to the public consultation on the Australian Health Practitioners Regulation Agency (AHPRA)'s review of the Criminal History Registration Standard (CHRS) and the English Language Skills Registration Standard (ELSRS).

In relation to the CHRS and as indicated in our previous advice during the preliminary consultation, the ADA supports the National Board's preference for Option 1, to retain the status quo. The ADA is not aware of any issues that have arisen in relation to the existing CHRS that would necessitate any change. The ADA believes that the 10 stated factors considered by the National Boards under Option 1 are fair and appropriate.

With respect to the ELSRS, the ADA provides the following comments:

- 1. The ADA supports the proposal to align the list of recognised countries for which an exemption from English language skills testing is required with those recognised by the Department of Immigration and Citizenship, including the phasing out of recognising South Africa in the Standard over a period of time.
- 2. The ADA does not support the proposal to accept test results from multiple sittings nor the introduction of subjective approaches to the interpretation of test results that do not meet the minimum accepted standard for dentistry.
- 3. The ADA does not support extending the time for which English language skills test results are considered to be valid beyond two years.

If you would like any further information, please contact

Yours faithfully,



Dr Karin Alexander President