

# SUBMISSION TO REVIEW OF REGISTERED NURSE ACCREDITATION STANDARDS

23/10/17

## INTRODUCTION

Universities Australia welcomes the opportunity to respond to the Australian Nursing and Midwifery Accreditation Council's (ANMAC's) discussion paper regarding the review of Registered Nurse Accreditation Standards.

Universities Australia is the peak national body for Australia's 39 comprehensive universities and represents nationally, its member views through political advocacy and policy activities regarding higher education sector issues.

Universities Australia is informed in health professional education matters through the Health Professions Education Standing Group (HPESG) that comprises representatives from the Councils of Deans of all health professional disciplines taught in universities. This includes representation from the Council of Deans of Nursing and Midwifery (Australia and New Zealand - CDNМ). Universities Australia understands that the CDNМ is also responding to this discussion paper and refers ANMAC to that response.

## Response to the Review

Universities Australia's short response is specifically in relation to the matter of English language requirements to study nursing, particularly the question:

*“Should students who are required by the Nursing and Midwifery Board of Australia (NMBA) to provide a formal English language skills test result for registration also be required to demonstrate achievement of the NMBA specified level of English language skills before starting a registered nurse program?”*

The question essentially asks whether the English language proficiency required to commence study on an accredited registered nurse program needs to be the same as that required to practice as a registered nurse.

The NMBA's current English language requirement for registration as a registered nurse is an International English Language Testing System (IELTS) score of 7 or equivalent<sup>1</sup>.

While this level of English language proficiency is not explicitly required in the current accreditation standards for registered nurse study programs, the current standards already address English language proficiency requirements in relation to:

- differentiating study from registration/practice requirements;
- protecting patient and public safety, including elements related to communication;
- maximising the likelihood of students' academic success, including provision for English language proficiency or other support; and
- promoting diversity.

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<sup>1</sup> As highlighted in the discussion paper, various English language tests are used but the IELTS is used here for consistency. Two alternative evidence pathways are also provided in the registration standards.

For example, under accreditation Standard 6: Students, higher education providers must inform prospective students, before they accept an offer of enrolment, of various requirements including:

- “specific requirements for entry to the program including English language proficiency” (6.1a);
- “requirements for registration as required and approved by the NMBA including but not limited to the explicit registration standard on English language skills.” (6.1d);
- “...sufficient language proficiency and communication skills to be able to successfully undertake academic and workplace experience requirements throughout the program.” (6.3).

Standard 6 also requires that education providers:

- “... register students with the NMBA and notify the Australian Health Practitioner Regulation Agency (AHPRA) if a student undertaking clinical training has an impairment that may place the public at risk of harm” (6.1b);
- “[have in place] processes to enable early identification and support for students who are not performing well academically...” (6.5); and
- encourage Aboriginal and Torres Strait Islander peoples and people from socially, culturally and linguistically diverse backgrounds to enroll and provide support for these students where needed (6.8, 6.9).

Universities Australia recognises that nurses are a major workforce in the healthcare system and play a key role in delivering safe, quality health care. Fundamental to this is the ability to communicate clearly with a wide range of people, under a number of different circumstances using a variety of mediums. Adequate English language proficiency is unarguably a prerequisite for this.

English language proficiency to study also needs to be high. However Universities Australia questions whether English language proficiency at the *commencement of study* needs to be as high as that required for graduate nurses to *practice* competently and safely.

Universities Australia notes that the discussion paper refers to evidence suggesting that in some cases, students show little improvement in English over the course of study. As the discussion paper itself outlines, these studies are generally based on small sample sizes, have often only explored measurements over one semester and findings have not always been replicable.

As highlighted in the discussion paper, findings need to be treated with caution as study methodologies have varied, findings are inconsistent and improvements are differential in domains and according to baseline scores. While findings seem to indicate that the domains of listening and reading are more strongly correlated with academic outcomes, evidence of correlation between academic success and language proficiency is weak<sup>2</sup> and many variables appear to impact language proficiency change. For example, students with language backgrounds typologically distant from English have greater challenges with English language proficiency but also higher levels of motivation to improve. English language proficiency over a lifecycle of a university student and stage of degree are also important variables<sup>1</sup>.

Much of the debate depends on what constitutes proficiency. Yet the nature of “proficiency” is often contested. Proficiency has more recently been shown to be context, occupation and discipline specific. Yet discipline-specific language proficiencies are not always tested through IELTS. For example, some have questioned the need for nurses to attain very high written IELTS scores as nurses generally deal with notes, forms, charts and checklists with fewer requirements to read or write complicated extended texts in practice. In contrast, the high level oral language

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<sup>2</sup> Rather, English language proficiency enables, but does not guarantee, academic success (Humphreys 2015).

skills needed by nurses to discuss sensitive issues while navigating complex social situations are not accounted for in the current IELTS<sup>ii</sup>.

The multiple variables that contribute to English language proficiency suggest that students with English as an additional language should not be treated as one homogenous group but that differentiated support is more appropriate<sup>i</sup>. Recognition of this complex nature of English language proficiency has increasingly led to a move away from purely “front-end” considerations (i.e. setting an IELTS or equivalent entry level as a definitive measure) to supporting the development of English language proficiency and academic literacies throughout a degree within disciplinary learning<sup>iii</sup>.

Various approaches can be - and are - used within universities for more consistent positive impacts on English language proficiency. These include: better embedding English language in teaching; scaffolding academic literacy; providing clearer student feedback; offering increased opportunities for oral presentations; and supporting students to become more integrated into university life overall<sup>iv</sup>. The Griffith Language Enhancement Strategy<sup>v</sup> is one example of several university frameworks developed to increase English language skills among international students to maximise their chances of academic success.

### **Overall Universities Australia view**

Universities Australia supports approaches to registered nurse study that underpin academic success, student retention and the development of competent, safe and effective health professionals. Universities Australia acknowledges the need for proficient English language skills as a component of this.

Universities Australia understands that English language proficiency requirements for study need to be adequately high and supports accreditation standards that allow universities, as autonomous institutions, to gauge and set these themselves<sup>vi</sup>. Universities Australia believes the current accreditation standards already address this in relation to academic work and clinical training (Standard 6.3).

Universities Australia believes that the current registered nurse accreditation standards also make adequate provision for English language proficiency in relation to: public safety interests; informing prospective students that the English language proficiency requirements to study are different from those required to practice as a registered professional; and the provision of academic support for students regarding English language proficiency.

Universities are also well placed to further support students in relation to English language proficiency through approaches such as the language enhancement strategy that more specifically targets individual students’ specific needs.

Universities Australia acknowledges the apparent logic behind aligning English language requirements for commencing study with those for registration however believes there is currently inconclusive evidence to support this as an accreditation requirement.

Universities Australia welcomes the opportunity to explore these matters further with ANMAC, including through ANMAC’s ongoing consultation, and will continue to discuss these matters further with HPESG and other Universities Australia member committees as appropriate.

### **References**

<sup>i</sup> Humphreys, P 2015. English Language Proficiency in Higher Education: Student Conceptualisations and Outcomes. PhD Thesis.

<sup>ii</sup> Sedgwick C, Garner M and Vicente-Macia, I. Investigating the language needs of international nurses: insiders’ perspectives. IELTS Research Reports Online Series ISSN 2201-2982 Reference: 2016/2. [https://www.ielts.org/-/media/research-reports/ielts\\_online\\_rr\\_2016-2.ashx](https://www.ielts.org/-/media/research-reports/ielts_online_rr_2016-2.ashx)

<sup>iii</sup> Personal Communication from Pamela Humphreys, October 2017.

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- <sup>iv</sup> Australian Government Australian International Education and International Education Association of Australia (IEAA) 2013. Five Years on: English Language Competence of International Students. Outcomes Report June 2013: <https://www.ieaa.org.au/documents/item/54>
- <sup>v</sup> Griffith University. English Language Enhancement Strategy: <https://intranet.secure.griffith.edu.au/teaching/english-enhancement-strategy>
- <sup>vi</sup> Universities Australia and Professions Australia 2016. Joint Statement of Principles for Professional Accreditation: <http://bit.ly/2xZ2VOw>