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## **SUBMISSION TO**

# AUSTRALIAN HEALTH PRACTITIONER REGULATION AGENCY AND NATIONAL BOARDS

RE

# PUBLIC CONSULTATION PAPER ON CRIMINAL HISTORY REGISTRATION STANDARD AND ENGLISH LANGUAGE SKILLS STANDARD

FROM

### CHIROPRACTORS' ASSOCIATION OF AUSTRALIA (NATIONAL) LIMITED

20<sup>TH</sup> December 2013

For further information contact: Andrew McNamara CEO Chiropractors' Association of Australia



The Chiropractors' Association of Australia (National) Limited (CAA) is pleased to respond to Public consultation: *Review of Criminal history registration standard and English language skills registration standard*, dated October 2013.

#### **Criminal history registration standard**

Questions for consideration

The Boards are inviting feedback on the following questions.1. From your perspective, how is the current registration standard working?

#### CAA believes the current standard is working well.

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?

#### At this time CAA sees no specific state or territory issues that would impact the standard.

3. Is the content of the registration standard helpful, clear and relevant?

The revised format makes this standard clear and easy to understand.

4. Is there any content that needs to be changed or deleted in the registration standard?

It does not appear that there is any content needing to be changed or deleted.

5. Is there anything missing that needs to be added to the registration standard?

#### It does not appear that there is anything that needs to be added to the standard.

6. Do you have any other comments on the registration standard?

CAA supports the preferred option 1 – status quo, as outlined in the consultation document.

#### English language skills registration standard Questions for consideration

The Boards are inviting feedback on the following questions.

1. From your perspective, how is the current registration standard working?

#### CAA believes the current standard is working satisfactorily

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? If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?

#### CAA agrees that the standard should be consistent with recognized Department of Immigration and Citizenship exemptions from English language testing and that recognition of South Africa in the National Boards' English language skills registration standard should be phased out over time

3. 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?

#### CAA does not possess any evidence to indicate other countries should be recognized in this standard.

4. Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?

CAA considers that in cases that are very close to, but slightly below, the standard should be considered on a case by case basis, with an added recommendation to affected applicants to undertake additional recognized English language training or education.

5. 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?

#### The current process appears to be satisfactory.

6. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?

#### The draft revised standard is clear and the new format makes the document more workable.

7. Is there any content that needs to be changed or deleted in the revised draft registration standard?

It does not appear that there is any content needing to be changed or deleted.

8. Is there anything missing that needs to be added to the revised draft registration standard?

It does not appear that there is anything that needs to be added to the revised draft registration standard.

9. Do you have any other comments on the revised registration draft standard?

CAA supports the preferred option 2 and the proposed revised standard, as outlined in the consultation document.