

22/10/2017

Standards Review
Australian Nursing and Midwifery Accreditation Council
GPO Box 400
Canberra City, ACT 2601

Dear Standards Review Committee,

The Australian Technology Network of Universities (ATN) would like to thank you for the opportunity to comment on the “Review of Registered Nurse Accreditation Standards – Consultation paper 1”.

The ATN is a national collaborative group of five major universities including QUT, University of Technology Sydney, RMIT University, University of South Australia and Curtin University.

The ATN firmly believes that a sustainable, accessible, and quality education system are core to Australia’s long-term prosperity and societal wellbeing.

The ATN response will be directed to one of the questions found in the consultation paper, but the ATN notes that individual ATN universities may separately submit more comprehensive responses that represent the views of their institution.

The ATN response is in regards to the English language requirement for entry to Bachelor of Nursing programs, question 3: *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?*

University autonomy is paramount to a rigorous, robust and thorough higher education system. The autonomy of universities has been earned due to universities long standing proven record of compliance and performance management. Universities in Australia are highly regulated entities that have demonstrated the justification for autonomy by: ensuring they have complied with the checks and accountabilities of university establishment acts; internal university quality assurance and governance structures; and peer-review and benchmarking activities. Universities are also subject to the remit of the Tertiary Education Quality and Standards Agency (TEQSA), an independent, national quality assurance body which assesses the performance of higher education providers against the Higher Education Standards Framework. This framework contains specific sections relating to university admissions which must be met by Australian universities.

The ATN has considerable concerns with the suggestion that admissions to a program would be subject to outside skills tests. As noted above, Australian universities are autonomous, self-accrediting institutions who have full control over admissions criteria and procedures. Universities admit students whom are judged to have the potential to succeed in the courses for which they are applying. It is not in the interest of universities to enrol students who will

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not be able to succeed in their academic endeavours. Thus, universities are best placed to determine the competency of a student for higher education study.

Whilst there are arguments put forward regarding English language proficiency for skilled migration, there is limited robust research to support a minimum English language literacy threshold for commencement of a three-year undergraduate nursing degree. Additionally, the recent recommendations made by the Higher Education Standards Panel on increasing transparent higher education admissions noted the importance of respecting the autonomy of universities to ensure they have the correct criteria for student admissions. As such, entry criteria should therefore remain at the sole discretion of the university and be certified within the internal and external TEQSA quality assurance standards.

The ATN also wishes to note that universities with an accredited program leading to registration as a Nurse are required to demonstrate for accreditation that they assist students to develop English language competency. This accreditation, along with the long history of self-accreditation and autonomy granted to universities, leads the ATN to strongly recommend that the NMBA not require potential nursing students to demonstrate achievement of the NMBA specified level of English language skills before starting a registered nurse program but instead leave decisions relating to admissions to individual universities.

Please do not hesitate to contact the ATN Directorate on (02) 5105 6740 or via e-mail at renee.hindmarsh@atn.edu.au to discuss any elements of the submission further.

Yours sincerely,



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