

English Language Policy Consultation

The Occupational Therapy Board of New Zealand (OTBNZ) recently consulted with the profession and stakeholders about changes to the English Language Policy for applicants wishing to register in New Zealand as occupational therapists.

The OTBNZ received 17 responses to the consultation. The OTBNZ extends its thanks to those who took the time to consider the policy and provide their invaluable feedback.

The OTBNZ has carefully considered the responses and has made changes to the policy as a result. The updated policy is included below, along with a summary of the subsequent changes.

The policy was approved by the OTBNZ Board on 10 December 2019. Review of the Policy is scheduled in 2 years.

Summary of changes to draft policy

Submission	Draft policy	Final policy
'English as first language' not defined	-	For the purposes of this policy the OTBNZ defines 'first language' the language that the applicant learnt to speak first, also known as their mother tongue.
Clarification of who policy applies to		This includes applicants who have received their training in Aotearoa New Zealand, and those who received their training elsewhere.
Exemption for speakers of official languages of New Zealand (Te Reo and NZ sign language)	-	Applicants whose first language one of New Zealand's official languages are exempt from this policy.
Update references to head of school	"Notification from the appropriate school that..."	"Notification from an OTBNZ accredited programme that..."
Update references to head of school	"Attestation by the head of the occupational therapy school that the applicant has..."	"Attestation by the lead occupational therapist within an OTBNZ accredited programme that the applicant has..."
Update references to clinical/fieldwork supervisor	"A reference from a final year clinical/fieldwork supervisor stating..."	"A reference from a final year fieldwork educator/supervisor attesting..."
Remove reference to issues identified during the course of study	"...as had no identifies issues with communication in English during their course or clinical placements..."	"...the applicant can comprehend and communicate effectively in English"
Remove the requirement for the clinical/fieldwork educator/supervisor to have English as their first language	"The supervisor must have English as their first language"	Requirement removed. All registered practitioners have met English language requirements on registration.
Allow extra information to be obtained via an interview with OTBNZ staff remotely	"...requiring the applicant to attend an interview with OTBNZ staff or nominated assessors (Travel would be at the applicant's expense)."	"...requiring the applicant to attend an interview with OTBNZ staff or nominated assessors, either remotely (eg, zoom) or in person (travel would be at the applicant's expense)."

One submission asked for application numbers in their submission

	Applicants registered in 2019 (Jan-October)	Number of applicants registered for whom English is not their first language
Overseas qualified applicants	48	14 (29%)
New Graduates	42	6 (14%)

English language policy for registration

The Occupational Therapy Board of New Zealand (OTBNZ) is required by the Health Practitioners Competence Assurance Act 2003 to ensure that applicants are able to communicate and comprehend effectively in English in order to work as an occupational therapist in Aotearoa New Zealand (Section 16 (a&b))

Scope

This policy applies to all applicants applying to register with the OTBNZ where English is not their first language. This includes applicants who have received their training in Aotearoa New Zealand, and those who received their training elsewhere. For the purposes of this policy the OTBNZ defines 'first language' as the language that the applicant learnt to speak first, also known as their mother tongue.

Applicants whose first language is one of New Zealand's official languages (Te Reo Maori or NZ sign language) are exempt from this policy.

Acceptable methods

Where English is not the first language of the applicant the applicant must demonstrate their ability to communicate effectively by either the:

1. Submission of acceptable test results from an approved English language test

OR

2. Completion of a primary undergraduate occupational therapy qualification in Aotearoa New Zealand and appropriate attestations.

Approved tests

The OTBNZ recognises two international English language standard tests to demonstrate competency for registration. Applicants are free to choose either test. The OTBNZ will verify all results of English language testing using the provider's online verification system.

Provider	Website	Relevant test	Standard to be achieved
Occupational English Test	www.occupationalenglishtest.org	Occupational therapy	Minimum score of B in each of the four components (listening, reading, writing and speaking).
International English Language Testing System (IELTS) academic	www.ielts.org	Academic	At least 7.0 in each band

Applicants may combine (club) the results of more than one test attempt to achieve the results required, however the standard must be achieved within 12 months of sitting the first test. Test results must be no older than 24 months when they are submitted.

New Zealand graduates

Where an applicant has completed their primary occupational therapy qualification in Aotearoa New Zealand the applicant can demonstrate their ability to communicate by:

- Notification from an OTBNZ accredited programme that the applicant has completed an undergraduate degree in occupational therapy in Aotearoa New Zealand (Bachelor of Health Science (occupational therapy) or Bachelor of Occupational Therapy)
AND
- Attestation by the lead occupational therapist within an OTBNZ accredited programme that the applicant can comprehend and communicate effectively in English.
AND
- One (1) reference from a final year fieldwork educator/supervisor attesting to the applicant's ability to comprehend and communicate effectively in English.

Further information

The OTBNZ will not approve registration where there is doubt about an individual's ability to communicate clearly in English. Applicants in this situation will be managed on a case by case basis.

The OTBNZ reserves the right to make further enquiries by:

- seeking additional information from sources such as fieldwork educators/supervisors.
OR
- Requiring the applicant to attend an interview with an OTBNZ nominated assessor, either remotely (eg, zoom) or in person (travel would be at the applicant's expense).

Effective from: 10 December 2019	Review by: Dec 2021
Approved by: OTBNZ Board	Version 1.0

Submissions to English Language Policy consultation:

Do you support the changes to the English Language Policy?

Support (whole or partial)	10
Do not support	2
Unspecified	5

Verbatim submissions:

Submission from	Do you support the changes to the English Language Policy?	Submission
Lisa Lyons	I'm feeding back on the ESL change in policy. I'm happy with the proposed change with the clarity that the field work/ supervisor providing reference should have English as their first language?	I'm feeding back on the ESL change in policy. I'm happy with the proposed change with the clarity that the field work/ supervisor providing reference should have English as their first language?
Ruth Spain	I support the proposed changes to the OT Board English Language Policy for Registration. I do not	

	have any comments nor a submission to make.	
<u>Karen McCabe</u>		<p>I feel it is important to retain assessment by three Practitioners rather than just the final Assessor purely for the fact that the final Assessor may be of similar first language and therefore have a greater ability to understand what the new registrant is saying.</p> <p>Whilst I am English and English is my first language, I have experienced service-users difficulty in understanding what I say despite being mindful of 'dumbing down' my English accent to make it easier to understand. Without doubt I have a very high regard for practitioners whose first language is not English, but I am also cognisant of accents being potentially very difficult to understand over the telephone and the written word being unclear, which is why I do believe that more than one Assessor is required to validate how easily the candidate can be understood across the various mediums of communication.</p>
<u>Terrie Hunt</u>	I support the proposed changes to the English Language Policy	
<u>Jonathan Armstrong</u>	I support the decrease from three to one reference from the applicant's final year fieldwork supervisor.	It is unclear whether the supervisor is still required to have English as their first language. I would suggest that they do.
<u>Marie Chester</u>	I am generally in favour of the proposed English language competency requirements	I think it should suffice for one supervisor to verify (or not) English competency in the clinical field. However, there is no mention of overseas graduates who might be proficient in several languages and completed their training in English as the language of instruction (as in India for instance). Are these people to be made to complete an English competency test?

<p><u>Yvonne Harris</u></p>	<p>I do not support this move and suggest that the number of clinical/fieldwork supervisors attesting to English language competence should be two.</p>	<p>I support that they should be native speakers of English. A native speaker of English needs to be defined as a person who has been communicating using English prior to the age of 10 years in a country with English is used as a primary language.</p>
<p><u>Jane miller</u></p>		<p><i>“Applicants may combine (club) the results of more than one test attempt to achieve the results required, however, the standard must be achieved within 12 months of sitting the first test. Test results must be no older than 24 months when they are submitted.”</i></p> <p>I wonder about this time limit, as people may fail the test, but study further and eventually achieve the standard. I do feel strongly that people need to have adequate English to become registered, but if it takes them longer than 12 months, why can they not reapply?</p>
<p><u>Alison Coyle</u></p>		<p>I am wondering whether this is only for NZ trained OTs, or whether it will be valid for overseas qualified applicants too? Some may come from English speaking countries (USA, UK) but still not actually be first language / home language English speakers? Or countries like South Africa where there are multiple national languages, with a percentage of the population being English first language speakers. For those people, having to undertake an English language test would surely be ridiculous ? Does the same standard apply perhaps if they have qualified as an OT from an English speaking university (eg UCT) with all assessments in English, and get a reference from English first language supervisor?</p>
<p><u>Ashleigh Green</u></p>	<p>In principle I agree with the reduction of 3 references down to 1</p>	<p>I do however foresee difficulty with ability to meet the requirement of final year fieldwork/ clinical supervisor having English as first language in order to make the declaration.</p> <p>As stated New Zealand occupational therapists come from diverse backgrounds with many qualified therapists having English as a second language. Within the DHB I work in, there are a number of competent and capable occupational therapists with English as a second language that support final year student placements. If these supervisors were excluded from taking placements due to supervisor's alleged inability to state ability to communicate effectively in English, our service would struggle to provide our quota of placements with the universities.</p>

		I hope that OTBNZ will see that excluding the growing number of practitioners with English as second language from supporting final placement students will be detrimental to securing placements
<u>Lynn Faulkner</u>	Had a read through and I think this looks like a good idea.	It might be worth considering placing a “condition of practice” (COP) that requires a person to undergo a final “clearance” from one independent supervisor (i.e. a fresh pair of ears that has not become attuned to the candidate’s speech) at the end of a nominated period of time in practice (a year perhaps). COP’s are a flexible safety net for all involved. I liken the challenge to ... it being easy to pass your driving test, but not so easy to drive well, until you have been doing it for a while because you don’t know what is ahead. That said, we do know that expectations once you are employed as a qualified practitioner are very different from students.
<u>Occupational Therapy Board of Australia</u>	Overall the Board broadly supported the proposed changes to the policy with two areas of suggested consideration.	The Board noted that the policy and the consultation document referred to applicants for whom English is not their first language. For clarity purposes, the Board suggested including some type of definition around what English as primary language entails in the context of this policy. The Board also noted the proposed conditions for New Zealand graduates, in particular the attestation by the head of the occupational therapy school that the applicant had ‘no identified issues’ with communication in English. For clarity purposes, the Board suggested further defining this threshold. The potential conflict of interest for the head of the occupational therapy school in providing this attestation should also be considered.
<u>Karen Harvey</u>	Yes I do but would like to see more as I feel this policy is discriminatory and not consistent with what I hope would be the professions values.	I believe the policy needs to be re-written to reflect that it does not include this requirement for Te Reo or sign language which are official languages as it is unclear. Other areas of the policy appear outdated considering the current times and I believe the board should seek outside consultation and consider this from a human rights perspective. The role of the OTBNZ is to protect the public by ensuring that occupational therapists in Aotearoa/New Zealand are fit and competent to practice, which includes ability to communicate in English. This is an interesting concept considering a number of our colleagues and clients now don’t have English as a first language (including Te Reo and other languages). The occupational therapy board also have an obligation to uphold the concept of human rights by not discriminating against particular populations. My concern is that this policy can be seen as discriminating against those with English as a first language due to the extensive nature of what needs to be undertaken. For example this requires

		<p>students to undertake an Occupational Therapy degree in NZ . Surely if they have to go through IELTS and all their course work (including placements) this would be sufficient to confirm their English ability. Also it is not clear from the policy if there are other options for those that have completed a degree overseas if their English is good to have an easier pathway to registration. I feel the current policy is less about patient safety and more about power and control. I would happy to discuss this in further detail or offer my support in thinking about other ways of working.</p>
<u>Jackie Herkt</u>	<p>Yes I support a change to the English Language policy as I believe it is too restrictive. I would like to see it even less restrictive for NZ graduates.</p>	<p>I believe these additional changes should be considered see below:</p> <p>Use of term ‘head of school of occupational therapy’ As titles and school/department names are different and at times change e.g. the word ‘school’ is not used by both programmes and the word ‘head’ is not used by either of the two accredited programmes of occupational therapy the following or similar wording should be considered:</p> <p>Lead occupational therapist within an accredited occupational therapy programme or their delegate.</p> <p>New Zealand Graduates - Requirement for a reference from a final year clinical/fieldwork supervisor</p> <p>All supervisors currently complete with students the NZ Occupational Therapy Fieldwork Assessment. Inherent in this assessment within a number of the competencies and performance indicators is the need for students to be able to communicate effectively. Should there be any concern a student would not pass the placement and therefore would not be eligible to apply for registration until they meet the competency/performance indicator. I believe that this negates the need for a reference and that the need for the reference is in an unnecessary piece of work for already busy people.</p>
<u>Harsh Vardan</u>		<p>In my view, a post graduate qualification (in occupational therapy) should also be counted as a prescribed qualification. Currently, the acceptable method is, “Completion of a primary undergraduate occupational therapy qualification in Aotearoa New Zealand”.</p> <p>Rationale: Migrants may already have an undergraduate OT qualification (from their home countries). If these migrants choose to do a post graduate study in New Zealand, then they should be able to qualify for the exemption process. Is there any reason why undergraduate courses and post graduate courses are treated differently in terms of ‘ prescribed qualification’ for the exemption policy?</p>

		<p>“Applicants may combine (club) the results of more than one test attempt to achieve the results required, however, the standard must be achieved within 12 months of sitting the first test. Test results must be no older than 24 months when they are submitted.”</p> <p>I think it is very useful as based on my experience IELTS has a poor inter rater reliability and applicant can get variable scores even within a short interval between the tests.</p> <p>“A reference from a final year clinical/fieldwork supervisor stating that the applicant’s ability to communicate effectively in English. The supervisor must have English as their first language”</p> <p>I think this is based on the assumption that only those supervisors who have English as their first language have the ability to comment on effective use of English as a language. Does this imply that New Zealand registered occupational therapist like me who has been practising in New Zealand for last 9+ years , is not competent to comment an applicant’s ability to communicate in English ? I find this interesting. I wonder if the board would consider reviewing this.</p>
<p><u>Dr Ellen M. Nicholson</u> Head of Occupational Science and Therapy, AUT</p>		<p>Thank you for the opportunity to provide comment/consultation on the proposed changes to the Occupational Therapy Board of New Zealand English Language Policy. On behalf of the Occupational Therapy Department team at AUT, I would like to provide the following comments regarding the proposed changes to policy:</p> <ul style="list-style-type: none"> - The wording in the policy does not sufficiently define or describe who the policy is for, beyond “an applicant...where English is not their first language” (p.1). For example, a student who is fluent in te reo Maori could be considered as having English as an additional language, are they also required to complete the reference check/s? - The policy change from three references to one reference doesn’t sufficiently address the need for the references in the first place. If an applicant has completed their high school studies in English (for example), and their undergraduate degree is completed in English, it remains unclear as to why all ‘applicants with English as additional language’ are being singled out to provide additional evidence of their ability to communicate in, and comprehend, English. - To that end, the Head of Department attestation at the completion of the BHSc(OT) should be sufficient evidence of the applicant’s ability to communicate in English. In addition to the degree being completed in English, there are several communication criterion which would need to be assessed (and passed) in the final fieldwork assessment which further demonstrates that the applicant is able to comprehend and communicate in English.

		<p>- Asking an applicant to rely on their final-year supervisor/fieldwork educator to provide a reference could be problematic if the relationship has been challenging while on placement. Has the Board considered other ways that the applicant may be able to provide evidence of their English language competence beyond a reference check, and the attestation letter from the HoD?</p> <p>- It's also unclear why the supervisor/fieldwork educator who provides the reference needs to have English as their first language – if the supervisor/fieldwork educator is a registered occupational therapist, they must have provided evidence that they can communicate and comprehend English as part of their own registration process.</p> <p>Furthermore, we seek clarification on the following points:</p> <p>- The comparability between the Occupational English Test and IELTS (p.1). AS IELTS is a test of English for academic contexts, whereas OET is a test of English for healthcare contexts, the Board needs to be clear that the results from these assessments are comparable. I draw your attention to Lim (2017) for example, who suggests that “the two [tests] are not entirely comparable, for entirely expected reasons” (p.6).</p> <p>- The need for a face-to-face interview to collect additional evidence/information, rather than utilisation of an online platform (such as, for example, Skype/Zoom) (p.2)</p>
<p><u>Nancy Wright</u> Undergraduate & Entry to Practice Co-ordinator (Occupational Therapy)</p>	<p>No – not in its present form – Nor do I want the previous version to be retained!</p>	<p>See below</p>

Nancy Wright

Undergraduate and Entry to Practice Co-ordinator (Occupational Therapy)

My comments are informed by twenty year experience as a senior lecture in Occupational therapy education, as a manager of an inpatient OT service in a large hospital, providing numerous placements for OT students and my current role in which I seek and support more than seventy fieldwork placements each year in Counties Manukau DHB and South Auckland.

Please see below my response to the two questions you have asked

Do you support the proposed changes to the English Language policy?

No – not in its present form – Nor do I want the previous version to be retained!

Are there any comments you would like to make about the policy?

General Comments

1. **Demographics** Is this policy grounded in the changing demographic of the OT student population and of the changing demographic of our workforce? How many registered OT's identify as having English as a first language? At what point is this asked of potential registrants? What is the evidence on which the policy is based? This should be more transparent.

Recommendation

That evidence is included in the preamble to the policy.

2. **Terminology:** The term fieldwork *educator* is more usual now than fieldwork/ clinical *supervisor*. The use of the term educator emphasises the educational focus of this role and that this role encompasses assessment of the student. It differentiates this role from that of a supervisor. Thus avoiding using the term "supervision" - which has specific meaning and function for our profession different to student work based education..

Recommendation

That the term fieldwork educator is used to describe someone who providing a fieldwork experience for students.

3. **Definition of phrase English as first language :** The policy applies to applicants wishing to register with the OTBNZ where "*English is not their first language*". The policy also states that an attestation of the students proficiency in English is required from the final fieldwork educator who "*must have English as a first language*". This phrase has not been defined and is open to interpretation.

Recommendation

That the Board include their definition of the term.

Comments related to the Policy Headings

Acceptable methods

Completion of a primary undergraduate occupational therapy qualification in Aotearoa New Zealand .

This phrase is misleading as the rest of the policy requires some graduates (i.e. those who do not have English as a first language) to provide more than the evidence of successfully completing an UG degree.

NB. Whilst at the moment there is not a Master's degree qualification leading to eligibility to register – there may be in the near future so perhaps this policy should reflect this potential change

Recommendation

That the phrase be reworded to more accurately reflect the intent of the policy

New Zealand Graduates

Notification from the appropriate school that the applicant has completed an undergraduate degree in occupational therapy in Aotearoa New Zealand (Bachelor of Health Science (occupational therapy) or Bachelor of Occupational Therapy)

This phrase applies to all graduates. The Board approves all OT curricula leading to the opportunity to apply for registration as an OT in Aotearoa, Therefore the Board is satisfied that the curricula meet their requirements – which includes the ability to communicate effectively. Why therefore is additional evidence beyond that of successful completion of the degree required?

Attestation by the head of the occupational therapy school that the applicant has had no identified issues with communication in English during their course or clinical placements.

This phrase requires the HOS to disclose any historic issue whether or not it was satisfactorily resolved. It is the nature of the learning experience that knowledge & skill develop over time. The premise of occupational therapy is that people can adapt and develop in response to feedback. Therefore a student may have had identified issues with English language during their learning experience which were satisfactorily addressed. What is the purpose of the Board being informed of this?

Recommendation

That the Board consider the purpose of this phrase and clarify that it is continued problems or enduring difficulties that they wish to have reported - if they wish to retain this clause.

A reference from a final year clinical/fieldwork supervisor stating that the applicant's ability to communicate effectively in English. The supervisor must have English as their first language.

There are a number of issues with this requirement:

1. Definition of English as a first language see my point above
2. The inclusion of this clause assumes that a registered occupational therapist with no restrictions on their scope of practice & who identifies as having a language other than English as their "first language" is less able to assess effective communication skills in students than a therapist who

identifies as having English as a first language. An example might be a Maaori OT who was raised in a Maaori speaking household, & was educated in Kohanga Reo/kaupapa Maaori settings prior to completing their degree in Aotearoa and who identifies as having Te reo Maaori as their first language. With the wording of this clause they are not eligible to provide a placement to a student who also identifies as having Te Reo Maaori as her/his first language. This scenario might also be applied to any other therapist who is bi or multi-lingual and who identifies English as additional to their first language.

3. The Board will be aware that there is a shortage of placement opportunities for OT students. There also appears to be an increase in students from culturally diverse backgrounds who may identify as having English as an additional language (this will depend on the Boards definition of course). The continued inclusion of this requirement will be a barrier to providing placement opportunities

Recommendation

That this clause is omitted entirely.