



Royal College of Nursing Response July 2022

Nursing and Midwifery Council (NMC) English language testing requirement

With a membership of close to half a million registered nurses, midwives, health visitors, nursing students, nursing support workers and cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and international political institutions, trade unions, professional bodies, and voluntary organisations.

RCN Member Engagement:

UK RCN member responses to engagement were sought with additional webinar presentations for further discussion.

Deep dives were undertaken with the RCN Professional Nursing Committee and the RCN International Committee.

Exploring the introduction of employer references

Responses:

1 *Accepting employer references as supporting evidence for those missing scores by 0.5 or half a grade as relevant.*

- 1.1 The RCN supports the acceptance of employer references in support of individual applicants who have a 0.5 or relevant half grade return to their IELTS and OET exams respectively. The RCN supports that this should be applied to all four domains of the assessment process: reading, writing, listening and speaking.
- 1.2 The RCN members presented that moves to accept employer references must be supported by guidance on what is considered as a quality reference. Further guidance and support must be supplied for employers applying this process, which addresses employers and registrants across health and social care.
- 1.3 The RCN states that the registrant and employer undertaking the reference must be provided with guidance to highlight the accountability of their roles. Clarity is required regarding organisational accountability and audit to provide assurance.

2 *Accepting employer references as supporting evidence for those trained in English, but in a non-majority English speaking country.*

2.1 The RCN does not agree with the acceptance of an employer reference as supportive evidence for those trained in a non-majority English-speaking country, due to a lack of capacity for skills and knowledge in the language.

3 Applicants using an employer reference must have worked for at least one year within the last two years in non-registered practice in a health and care setting in the UK.

3.1 The RCN supports the use of an employer reference for individuals who have worked for at least one year in the previous two years, as a non-registered role within health and social care.

3.2 The RCN supports that the registrant and employers, who had worked with the candidate, were able to assess the use of the English language in four domains, through observation of clinical care delivery over the 12-month period.

3.3 The RCN states that there is a need for clear guidance, regarding accountability and raising concerns, to address previous evidence presenting sign off process areas of concern.

4. Referees must work at the same organisation, be a NMC registrant and in a leadership role.

4.1 The RCN identifies the senior and leadership/organisation references that must be secured from registrants in the same organisation.

4.2 A registrant is not seen consistently in leadership roles across health and social care, leaving some international applicants unable to access reference support equally with other individuals.

4.3 The RCN requires further definition and clarity around what would be considered a leadership role, considering the different care delivery models across health and social care.

4.4 The RCN raises concerns about the implications of the capacity of the referee to complete extensive evidence reviews and reference completion. This could be supported with training, competence development, and accountability resources.

4.5 The RCN requires clarity that as an appointed referee an individual is acting as a representative of the organisation and providing a reference in their capacity as someone mandated to do so by the employer. This is important to ensure it remains the employer who holds the liability for the reference and not the individual

5 If the NMC were to accept employer references, how could they ensure that they consistently provided appropriate evidence of an applicant's ability for safe clinical interaction in English?

5.1 The RCN does not support an employer reference being used alone as evidence for English language competence, without supportive evidence being presented.

- 5.2 The RCN requires the NMC to provide an evidence criterion to ensure the validity and reliability of the reference. Such evidence should be included in the assessment criteria for reference and presented by the candidate at application to the referee. Examples: anonymised documentation, observed interaction, and professional/public feedback.
- 5.3 The RCN would like to see a framework and approach that is specific for the Independent Health and Social Care delivery of the changes. It was highlighted in responses that the consultation lent itself more towards the NHS in approach and language. Identification of the differing roles and needs of candidates and organisations must be considered.

Exploring the acceptance of Post Graduate qualifications:

- 6** *Accepting post-graduate qualifications taught and examined in English as supporting evidence for those missing scores by 0.5 (IELTS) or half a grade (OET).*
- 6.1 The RCN supported the acceptance of a post-graduate qualification taught and examined in English.
- 7** *Accepting post-graduate qualifications taught/examined in English as supporting evidence for those trained in English but in a non-majority English-speaking country.*
- 7.1 The RCN requires consideration of additional evidence and employer references to be applied to support applications to assess the four domains of the English language to demonstrate competence and use of language.
- 7.2 The RCN agrees that the use of Post Graduate qualifications in a non-nursing topic can be used as evidence, providing all four domains have been achieved. It is recognised the IELTS and OET tests are to assess competence in the English language domains and a test of competence will also be required for NMC registration.
- 8** *Extending the period someone can combine test scores from 6 to 12 months.*
- 8.1 The RCN agreed that there should be an extension from 6 to 12 months for applicants to undertake and combine test scores.
- 8.2 The RCN stated that assurance should be provided by the applicant to a referee or organisation, of the date commencement of the first test and expiry date of the final test.
- 9** *Standardising the minimum score accepted across sittings to be no more than 0.5 below the required score for all language domains when combining test scores on IELTS (minimum score for reading, speaking and listening when test combining = 6.5; minimum score for writing when test combining = 6).*
- 9.1 The RCN agreed that the minimum score should be standardised and accepted across sittings to be no more than 0.5 below the required score for all four English language domains, when combining the IELTS test scores.
- 10** *Standardising the minimum score accepted across sittings to be no more than half a grade below the required score for all language domains when combining test scores on OET (minimum score for reading, speaking and listening when test*

combining = C+; minimum score for writing when test combining = C). We don't propose changing the overall score we require for language tests.

- 10.1 The RCN agrees that the minimum score accepted across candidate sittings should be no more than half a grade below the required score for all four English language domains when combining the OET test.
 - 10.2 The RCN recognises the importance of assessing all four domains, to maintain public safety, and would like to see evidence included within the tests addressing clinical competence and assessment.
 - ✓ The RCN agrees that the overall pass score for IELTS English language test is 7.0.
 - ✓ The RCN agrees that the overall pass score for the OET English language test is a B.
 - 10.3 The RCN notes that speaking and listening are achieved when learning a language often before reading and writing. Candidates find the reading, within the time limit given challenge. Consideration may be given to reducing the reading score to align with writing, but not the listening score.
 - 10.4 There was a general view that a framework for the independent sector would be valuable, as the language used within the consultation was more tailored to the NHS.
- 11 ***How these proposals could impact individuals based on their protected characteristics.***
- 11.1 The RCN states all resources, reference guidance and tests must address candidates who fall with neurodiversity and disability equality. A full equality impact assessment, addressing any changes to the process must be published addressing the proposed changes.
 - 11.2 Candidates and referees must be supported to raise issues and concerns regarding support. The NMC responses and actions should be published.
 - 11.3 The RCN supports changes with the development of health and social care-specific training programmes for international nurses, referees, and organisations that will address equality and diversity, cultural nuances, and nursing/ medical terminology.
 - 11.4 The RCN recognises that IELTS and OET International candidates will experience increased stress. Candidates must be offered support and specific resources identified to support individuals who are unable to complete the process and are required to return to their original country of origin.
 - 11.5 Applicants should not be required to attain a particular 'level/grade' prior to seeking a reference (for example NHS Agenda for Change Band 4 or equivalent) as this was not considered an equal requirement across health and social care roles. The NMC should include guidance on how much 'non-registered' practice needs to be in the employment area where the referee is

based. There is a need for clarity on whether the referee should have worked with the candidate and for how long.

12 Should the standards we set for English Language proficiency be the same across the three professions the NMC regulates?

12.1 The RCN agrees that Registered Nurses, Midwives, and Nursing Associates should consistently follow a standardised approach and assessment criteria.

Additional reading

- NMC Consultation: [English language requirements \(nmc.org.uk\)](https://www.nmc.org.uk/consultation/2022/07/22/ielts-requirements)
- RCN Raising Concerns: <https://www.rcn.org.uk/Professional-Development/publications/rcn-raising-and-escalating-concerns-uk-pub-009425>
- Failure to Fail: <https://www.sciencedirect.com/science/article/abs/pii/S1471595316300476?via%3Dihub>