



21 September 2017

Trade Sub-Committee  
Joint Standing Committee Foreign Affairs Defence and Trade  
Parliament House  
Canberra ACT 2600

(by email through Mr Andrew Dawson, [Andrew.Dawson.Reps@aph.gov.au](mailto:Andrew.Dawson.Reps@aph.gov.au) )

Dear Chair,

**Response to Questions - Inquiry into Australia's Trade and Investment Relationship with the United Kingdom**

Thank you for providing an opportunity for Aspen Medical to participate in the Trade Sub-Committee's inquiry into Australia's trade and investment relationship with the UK.

Responses to the questions raised by the Sub Committee during the Public Hearing:

1. *How long do Nurses need to wait in completing the UK Registration process?*

The Nursing and Midwifery Council (NMC) is largely silent on the time it takes for a suitably Australian qualified and experienced Australian Nurse to be registered in the UK. Anecdotal evidence from our own planning for a relatively recent proposal, suggests anywhere between 3 – 6 months with some Nursing agencies. Also see <http://www.continentaltravelnurse.com/faqs/> suggesting up to 6 months.

The various components of UK Registration are:

- Online self-assessment
- IELTS (English Language Test)
- Application for nursing/midwifery
- Part 1 test of competence CBT ( computer based theoretical test that can be conducted at any approved centre around the world)
- Part 2 test of competence OSCE only available through 3 Universities and only in the UK: University of Northampton, Oxford Brookes University or Ulster University
- Admission onto the register
- UK Immigration process\*

\*Note: if you have a sponsor your sponsorship will formally start from the date (and up to 14 days prior to) of your scheduled Part 2 test in the UK. If you don't have a sponsor you may enter the country on a visitor visa specifically to take the test.

2. *What do we need to do to fix this?*

We request consideration for the UK and Australian Government respective regulatory bodies to recognise each other's Clinical Registration. That is, if Australian Healthcare clinicians are registered through the Australian Health Practitioner Regulation Agency (AHPRA) and are current, then they can also practice in the UK.

Mutual recognition is the most favourable but other options may include

- Remove IELTS requirements on evidence of AHPRA registration
- Nominate approved Universities within Australia that can provide the Part 2 Test

3. *Are we able to quantify the commercial value of this soft trade barrier for Nurses?*

The hard and soft costs of NMC registration make it difficult for an Australian based company to provide a commercially viable proposal that includes importing Australian nurses as part of the solution.

Our cost per individual nurse candidate would include, but not be limited to:

- NMC Registration £1,415 = AUD\$2385
- IELTS circa AUD\$330
- UK Immigration visa from £200 = AUD\$337

Add to this the soft but real cost in lost productivity and the opportunity cost from the burden of regulation on the individual then this makes it difficult to construct a viable commercial proposal for a UK delivery solution.

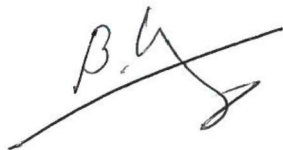
The total individual hard cost of approximately AUD\$3,052 could be extrapolated out over the proposed workforce for a project (as an example 100 nurses AUD\$305,200) but it is noted that the in country lost productivity whilst completing all registration and waiting for Registration confirmation is the primary challenge in constructing a commercially viable proposal.

4. *Where does the UK rank in ease of business for an Australian company delivering health services?*

The UK has an element of trade barriers like all countries but these are not comparable to the challenges in many other countries. They are not in our top 5 list of countries that are difficult to export to.

Please contact me if any further clarification is required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Armstrong', written over a horizontal line.

Bruce Armstrong  
Chief Executive Officer  
Aspen Medical Group