
English language proficiency for international applicants

English language proficiency

Policy and Standards team

Reviewing our requirements

- English language proficiency is a statutory and standards requirement, and necessary for safe and effective practice.
- At present, international applicants can self-declare English as a first language, or prove that they have passed one of our two approved tests (IELTS or TOEFL), or a qualification that they can prove is equivalent.
- We are consulting on four proposals that would fundamentally change this system.
- Changes would only apply to new applications using our international route, so won't affect UK route registrations or readmissions.
- Consultation responses will be used to refine the proposals and help us plan a timeline for implementation.

Our proposals

Proposed changes would:

- Align us with how other professional regulators assess English proficiency
- Create new pathways for applicants who do not speak English as a first language but who can otherwise practise safely and effectively in English
- Move the application process away from subjective decision making
- Focus on country where applicants earn their qualifications rather than country of birth or where they live when applying

Our proposals

Proposal 1: ending self-declaration of English as a first language

Proposal 2: list of qualifying countries
(majority English speaking, primary qualification)

Proposal 3: expanded and exhaustive list of approved tests

Proposal 4: previous registration in listed countries and supervised UK work experience

Aims and likely benefits

It has been a long time since our policy has been reviewed and we are following other health and social care regulators in undertaking this work. We are also aware of a small number of cases raised by employers where registrants allegedly lacked sufficient English skills.

We are aiming to ensure a system that is robust, fair and clear. Our proposals should:

- Ensure that we maintain public protection
- Avoid changes to the level of proficiency we require
- Focus on evidence to prevent any gaming of the system, but stay proportionate for applicants
- Provide objective criteria and remove any subjective elements in verification, such as when to challenge an applicant's self-declaration, or compare their test provider
- Expand the options that applicants can use to show their proficiency
- Set clear and transparent expectations for applicants

Key points for employers

There are particular aspects employers may wish to consider when responding to our consultation.

- Do the proposals strike an appropriate balance between ensuring public protection and the number and diversity of new professionals entering the UK workforce?
- Part of the motivation for the proposals is to make sure that the system cannot be ‘gamed’ by applicants or unscrupulous support agencies. How can we make sure a new system is sufficiently robust?
- What are employers needs around overseas registration in listed countries, and supervised UK work experience? What are the support and information needs for employers if we move to a new system?
- How can we make sure that as many employers as possible answer our consultation?

We are happy to answer and clarifying questions about the proposals or the consultation. If you would benefit from this, please contact us: **consultation@hcpc-uk.org**

Equalities impact

- Draft Equalities Impact Assessment has been published alongside the consultation. This will be refined using the responses.
- Main impacts: cross-cutting impact on those who could no longer self-declare, potential costs for some international applicants, and related barriers.
- Some applicants would now take an exam, which adds complications when considering the impacts of protected characteristics upon salary and capacity to earn.
- Positive impacts: some applicants would face less risk of value judgements than under self-declaration, and coming from a majority English speaking country would now matter even if English is not their first language.
- We are particularly keen to hear from people who have experienced the international registration process and those who would be affected by it, as well as people who have protected characteristics under the Equality Act.

Equalities impact

- Cost and work requirements would impact everyone who can no longer self-declare, but people with protected characteristics of **race** and **pregnancy and maternity** may be **most impacted**.
- Race: the list of majority English speaking countries may disproportionately impact applicants who speak English but are from countries not on the list.
- Pregnancy and maternity: requirement to take a test instead of making a self-declaration may impact those with childcare needs and costs.

Key questions to think about

- How would replacing self-declaration with a qualifying countries list affect applicants?
- Would this make you more or less confident in the proficiency of colleagues?
- How should any list of majority English-speaking countries be drawn up?
- How would the proposals for registered experience overseas and supervised experience in the UK affect applicants and the public?
- Should we expand our list of test providers? Are there any that we should include?
- What are the impacts on equality, diversity and inclusion (EDI)?
- How can your organisation best make sure that colleagues and peers engage with the consultation?
- How could employers, professional bodies and unions support people through this process?
- Anything else?

Key questions to think about

Self-Declaration

- How would replacing self-declaration with a qualifying countries list affect applicants?
- Would this make you improve or decrease confidence in the professions you represent?

List of qualifying countries

- How should a list of majority English-speaking countries be drawn up?

Experience requirements

- How would proposals for experience overseas and experience in the UK affect applicants?
- Are there any issues for the public from these options?

Test Providers

- Should we expand our list of test providers?
- Are there any that you think / recommend we include?

Key questions to think about

Protected characteristics

- Would there be any equality, diversity and inclusion (EDI) impacts to consider?

Role of employers

- How could employers support international applicants with these new processes?
- How would employers respond to our proposals for overseas registration and supervised UK work experience? What should HCPC be aware of in advance of this?

Next Steps

- How can you help us promote the consultation and supporting activities?
- Is there anything else we need to do?

Timeline

- Our consultation opened on 16 October 2023
- Closes on 19 January 2024
- We are consulting on the proposals and the Equality Impact Assessment (EIA)
- We will then analyse the results and publish final proposals and an updated EIA by Spring of next year, ready for implementation.

Answering the consultation

We strongly encourage answering the consultation online

You can do that by:

- Scanning this QR code 
- Going to: www.hcpc-uk.org/Consultation-on-English-language

The consultation will close on 19 Jan 2024 at 23:59.

If you would further information or cannot use the online form, contact us at:

consultation@hcpc-uk.org



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Thank you.