

ANMF Submission to ANMAC consultation

REVIEW OF RE-ENTRY TO THE REGISTER ENROLLED NURSE ACCREDITATION STANDARDS

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INTRODUCTION

The ANMF is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of 275,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

As the largest professional organisation for nurses and midwives in Australia, the ANMF has, on behalf of our members, a genuine interest in, and concern for, matters relating to the education of our professions. We therefore have contributed significantly, and continue to do so, to a range of committees and working groups at national and jurisdictional levels, which relate to the design, accreditation and evaluation of education programs for nurses, midwives and assistants in nursing.



General Comments

The ANMF has an enrolled nurse membership of over 38,000. This represents more than half of all enrolled nurses on the national register, according to the total number of 63,081 shown in the 1 October – 31 December 2018 statistics for the Nursing and Midwifery Board of Australia (NMBA). We therefore welcome the opportunity to provide advice to the public consultation for the review of the Australian Nursing and Midwifery Accreditation Council (ANMAC) *Re-entry to the Register Enrolled Nurse Accreditation Standards*. The ANMF has a critical interest in accreditation standards which ensure enrolled nurses are educated and qualified for safe, competent and ethical practice and meet the NMBA *Enrolled Nurse Standards for Practice*. It is essential there are NMBA approved re-entry programs available for those previously enrolled nurses with a lapse in practice of between 5 to 10 years, to enable them to return to the profession, should they choose. Well-constructed programs incorporating well-supported, quality workplace experience is critical to optimising student's success in the program, to assist in attracting them back to the profession, and to retaining them as part of our future workforce.

Consultation questions

Question 1

Do the proposed accreditation standards enable education providers to design and deliver a program of study that ensures graduates, seeking to return to the register, have the required knowledge, skills and attitudes to meet the NMBA *Enrolled nurse standards for practice*? Please provide an explanation for your answer.

The proposed accreditation standards are comprehensive and consistent with the current ANMAC *Enrolled Nurse Accreditation Standards 2017* which are used to assess education programs leading to registration as an enrolled nurse. The ANMF supports the requirement that the education provider must be currently offering an NMBA approved entry-to-practice enrolled nurse program. Although the *Re-entry to the Register Enrolled Nurse Accreditation Standards* are extensive, many of the processes required to meet the proposed standards can be offered concurrently or aligned with the entry-to-practice enrolled nurse program. Given the current dearth of re-entry to practice programs, any opportunity to streamline processes may encourage education providers to seek accreditation and approval to offer these programs.



It is the view of the ANMF that the proposed *Re-entry to the Register Enrolled Nurse Accreditation Standards* are thorough and would enable education providers to design and deliver a program of study that ensures graduates can meet the NMBA *Enrolled nurse standards for practice*.

Question 2

Should any criteria be added? Please identify and provide an explanation for your answer.

None identified.

Question 3

Should any criteria be deleted? Please identify and provide an explanation for your answer.

Standard 6: Students, criterion 6.9 regarding affirmative action strategies to support people with diverse backgrounds to enrol in the program, is not relevant to include in these standards. Our rationale is that the student cohort for these programs is clearly defined as those previously enrolled nurses, who have had a lapse in practice of between 5 to 10 years and have been determined by the NMBA to be eligible to undertake a re-entry program.

Question 4

Are the proposed workplace experience placement hours sufficient to ensure competence to return to the register as an enrolled nurse?

The current requirement for workplace experience placement hours for the entry-to-practice enrolled nurse program, the Diploma of Nursing, is 400 hours. To be eligible to undertake a re-entry to practice education program, a previously enrolled nurse will have a lapse in practice of between 5 to 10 years. As such, it is the view of the ANMF that the 160 hours of quality workplace experience, not inclusive of simulation activities, is sufficient for re-entry students to demonstrate the attainment of the NMBA *Enrolled Nurse Standards for Practice* and thereby ensure competence to return to the register as an enrolled nurse.



Question 5

Please provide any other feedback about the structure and/or content of the proposed standards.

The Australian Qualifications Framework (AQF) is currently under review. Stakeholder consultation sessions are being held throughout February and March 2019, with the review due for completion in September 2019. This review may result in changes to AQF levels. Consideration will need to be given to the wording in Standard 1: Governance, criterion 1.3 which refers to the program of study needing to be equivalent to an AQF minimum Level 5 program as this level may change in the course of the review.

Standard 1: Governance, criterion 1.8 prohibits credit transfer or the recognition of prior learning being made available to students seeking entry to the program. Consideration will need to be given to whether this is permissible under the education providers and education provider's regulators' rules.

Standard 3: Program development and structure, criterion 3.8 should be amended to include that the summative assessment against the NMBA *Enrolled nurse standards for practice* in the clinical setting must be undertaken by a registered nurse.

Standard 5: Student assessment, the standard should be amended to include that the summative assessment of student performance against the NMBA *Enrolled nurse standards for practice* must be undertaken by a registered nurse.

Standard 6: Students, criterion 6.1 a. of the ANMAC *Enrolled Nurse Accreditation Standards 2017*, should also be included in criterion 6.1 of this standard:

6.1 a. students that would be required by the Nursing and Midwifery Board of Australia (NMBA) to provide a formal English language skills test when applying for registration, must provide a formal English language test result demonstrating they have achieved the NMBA specified level of English language skills, prior to commencing the program.

Standard 7: Resources, in criterion 7.8 requires that "Teaching staff are qualified in the relevant discipline for their level of teaching, to at least one qualification standard higher than the program of study being taught or with equivalent professional experience". The ANMF seeks clarification as to what is meant by equivalent professional experience?



Standard 8: Management of workplace experience:

- criterion 8.3, the term “place” should be amended to health care facility;
- criterion 8.5, should be amended to state “Clearly articulated models of registered nurse supervision, support, facilitation and assessment are in place for all workplace settings, so students can achieve the required learning outcomes and the NMBA *Enrolled nurse standards for practice*”;
- criterion 8.6, should be amended to ensure there is clear differentiation between health professionals who may support but not supervise nursing students and registered nurses who support and are required to supervise nursing students; should also change “this role” to “the role” in the second line;
- criterion 8.7, should be amended to state “Supervision and assessment of student practice against the NMBA *Enrolled nurse standards for practice*, within the context of the workplace experience, is undertaken by an appropriately qualified registered nurse.

CONCLUSION

The ANMF appreciates the opportunity to provide comment to the review of the ANMAC *Re-entry to the Register Enrolled Nurse Accreditation Standards* consultation paper, on behalf of our significant cohort of enrolled nurse members. As the largest professional and industrial body for enrolled nurses in Australia, the ANMF has a substantial interest in enrolled nurse education as it directly relates to a viable nursing workforce.

Enrolled nurse education programs must enable students to meet the NMBA *Enrolled Nurse Standards for practice* and prepare safe and competent enrolled nurses through attainable requirements which reflect contemporary nursing practice.