



Australian
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Submission to the Australian Nursing and Midwifery Council for Consultation Paper 1: Accreditation Standards required for Eligible Midwife Programs

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1. Introduction

Established in 1924, the Australian Nursing and Midwifery Federation (ANMF) is the largest professional and industrial organisation in Australia for nurses and midwives, with Branches in each State and Territory of Australia. The core business of the ANMF is the professional and industrial representation of our members and the professions of nursing and midwifery.

With a membership of over 230,000 nurses, midwives and assistants in nursing, our members are employed in a wide range of enterprises in urban, rural and remote locations in both the public and private health and aged care sectors.

The ANMF takes a leadership role for the nursing and midwifery professions by participating in the development of policy relating to: nursing and midwifery practice, professionalism, regulation, education, training, workforce, and socio-economic welfare; health and aged care, community services, veterans' affairs, workplace health and safety, industrial relations, social justice, human rights, immigration, foreign affairs and law reform.

Currently, the ANMF represents the largest number of registered midwives in the country, with over 19,000 members registered as midwives. This is almost two thirds of all registered midwives in Australia, according to the total number of 32,916 shown in the December 2013 statistics from the Nursing and Midwifery Board of Australia (NMBA).

The ANMF is pleased to have the opportunity to comment on the Australian Nursing and Midwifery Accreditation Council (ANMAC) *Consultation Paper 1: Accreditation Standards required for Eligible Midwife Programs* (the Consultation paper).

In responding to the Consultation paper, the ANMF wishes to emphasise the following points which form the basis for our position:

- The process for Eligible Midwives should mirror that required of those seeking endorsement as a Nurse Practitioner
- There is no clear evidence in support of the current Australian College of Midwives (ACM) Midwifery Practice Review (MPR) process as a criterion for determining midwife eligibility
- MPR, as it currently exists through the ACM, is not an education program but a peer review and reflective practice process. It is, therefore, inappropriate to include this process in the ANMAC Accreditation Standards
- The NPS National Prescribing Competencies Framework has been designed to be applicable for all health professionals who prescribe, which must include midwives
- Midwifery Scheduled Medicines Programs available to midwives and leading to endorsement to prescribe scheduled medicines for Eligible Midwives should be accredited by ANMAC
- These units of study should be offered as discrete modules embedded within a Masters degree program, that may be taken as a single unit regardless of whether the midwife is seeking eligibility

The ANMF response is made in the context of the Health Practitioner Regulation National Law Act 2009 (the National Law). We would like to reiterate the intended parallels between Nurse Practitioners and Eligible Midwives. That is, the provisions in the National Law for endorsement in relation to Nurse Practitioners (s95) and the provisions for endorsement in relation to Midwife Practitioners (s96) are identical. These ANMAC accreditation standards required for Eligible Midwife Programs, logically, should coalesce with the accreditation standards for Nurse Practitioner programs. While midwives in general seem to have taken exception to the title Midwife Practitioner, and the profession has arrived at the agreed term Eligible Midwife, it is reasonable to assume the education requirements should be similar.

In recalling the National Law as the starting point for Nurse Practitioners and Eligible Midwives, a review of the *Accreditation Standards required for Eligible Midwife Programs* becomes more straightforward. The pathway for notation as an Eligible Midwife should align with the pathway for Nurse Practitioner endorsement.

Specific Comments

The commentary to follow is in response to the issues identified in the ANMAC *Consultation Paper 1: Accreditation Standards required for Eligible Midwife Programs*:

Part 1. Standards for Midwifery Practice Review

Midwifery Practice Review

The ANMF is not convinced that the current MPR should be the criteria for suitability as an Eligible Midwife. There are no clear evidential outcomes in terms of improved safety and quality achieved through the current MPR program. Positive safety and quality outcomes are best addressed by replicating the NMBA Nurse Practitioner Registration Standards requirements. Therefore requirements for an Eligible Midwife Registration Standard should include: current general registration as a midwife in Australia with no conditions on practice; an identified minimum educational preparation (a Midwifery Professional Practice Review Program and a Midwifery Scheduled Medicines Program, as units of study embedded in a Masters degree program); a stipulated midwifery practice experience profile (3 years full-time post-registration as a midwife); and, compliance with both the Board's registration standard on continuing professional development, and yet to be developed Board *National Standards for Practice for Eligible Midwives*.

While an MPR, as it currently exists through the Australian College of Midwives, may be an appropriate process for enhancing professional midwifery practice, it is the ANMF's view that this MPR program should not be used as the mandatory criterion for determining eligibility.

Providers of Midwifery Practice Review

The NMBA in the Eligible Midwife Registration Standard defines an "Approved midwifery professional practice review program" as:

a formal professional practice review program for midwives accredited by the ANMAC and subsequently approved by the Board, that is designed to review evidence of a midwife's professional performance over time across the continuum of midwifery care.

(Nursing and Midwifery Board of Australia Eligible midwife registration standard p.1)

In the view of the ANMF, only a midwifery higher education provider should provide a formal midwifery practice review program leading to notation as an Eligible Midwife. This is consistent with ANMAC's approach to its accreditation standards for registered nurses and midwives, for nurse practitioners and for the proposed accreditation standards for Re-entry and EPIQ programs. The higher education sector providing midwifery practice review programs is also logical for a profession where an undergraduate degree is required for initial registration. The higher education sector is well positioned to provide these programs.

Should it be determined that a midwifery practice review program is required for Eligible Midwives, only a higher education midwifery provider can adequately offer and assess these programs. Midwifery practice review programs must be conducted by providers able to:

- register with and meet TEQSA Standards, as are those providers of initial qualifications for registration as a midwife
- accommodate demand including potential increases
- ensure access, including for midwives in rural and regional areas and with consideration for remote area midwives
- conduct reviews consistently, regardless of location or setting
- apply a robust quality framework
- offer programs at a reasonable cost to individuals
- provide referral to health and education support services
- provide a recognised credit/qualification as a unit of study in a Masters degree program

Qualified Privilege

This is a complex legal issue, particularly when general and explicit requirements for notification to the NMBA around conduct and health issues sit alongside any privilege. Comments on this should be limited as it is assumed that qualified privilege provisions are relevant to the Health Insurance Act. The ANMF making comment on formal decisions regarding qualified privilege made by ANMAC could only be done after legal advice. The ANMF does not believe comment and opinion on qualified privilege should be elicited from ANMAC stakeholders. It is for the ANMAC to seek the required legal advice.

Referral

Referral of midwives for further support and assistance, as a result of issues disclosed or discovered through a midwifery practice review program, should be to health or education services relevant to the issues identified. This may need to be independent of the education provider, the employer and the NMBA. The nature of the support provided should be confidential.

There are several examples of support services commonly used in health services and by higher education providers. In the absence of a national midwifery and/or nursing support service, such as the Nursing and Midwifery Health Program (Victoria), the higher education provider may be required to assist students to seek appropriate internal and/or external assistance.

Consumer involvement

Consumers should rightly be involved in the development, accreditation and further review of these Standards for Eligible Midwives. This could be as part of an ANMAC Expert Advisory Group, its Board and committees, or through an education provider's quality management processes.

While the ANMF fully supports involvement of consumers at the governance level of standards development and education programs, we consider that consumers should not be directly engaged in the assessment of a midwife's clinical practice.

Issues, gaps or duplications

The ANMF proffers the following issues for consideration:

1. In relation to Aboriginal and Torres Strait Islander peoples:

While these draft Standards require inclusion of considerations for midwifery services to Aboriginal and Torres Strait Islander women, along with specific supports for Aboriginal and Torres Strait Islander midwives, the ANMF has identified the following gap: professionals involved in midwifery education and practice review programs, along with those who might be contracted to provide health or education support programs, should be required to undertake advanced preparatory education and ongoing CPD in Aboriginal and Torres Strait Islander health, history and culture and the principles and practice of cultural safety.

2. Multicultural issues:

The ANMF believes the requirements we suggest in number 1, above, should also be applied to educational preparation and ongoing professional development in relation to providing midwifery care for people from other cultural backgrounds.

3. Terminology:

The NMBA Eligible Midwife Registration Standard uses the terminology of 'midwifery professional practice review program', as below:

An eligible midwife is also required to successfully complete a Board-approved midwifery professional practice program every three years...

(Nursing and Midwifery Board of Australia Eligible Midwife Registration Standard p.2)

There is reference in these ANMAC draft Standards to both 'midwifery practice review' and 'midwifery practice review programs'. These 'programs' appear to relate to an NMBA criterion for both initial and ongoing (every 3 years) notation as an Eligible Midwife. The language used in the ANMAC Standards should be consistent with that used by the NMBA.

Part 2: Standards for Programs Leading to Endorsement for Scheduled Medicines

The ANMF provides the following response to questions posed by the ANMAC in relation to the above-named Standard.

National Prescribing Competencies

The National Prescribing Service (NPS) Better choices, Better health *Prescribing Competencies Framework* (the NPS Framework) is applicable for all health professionals who prescribe, regardless of the discipline from which those professionals come. This must include midwives.

The NPS Framework adequately covers specialised areas of prescribing for Eligible Midwives. Eligible Midwives have the same responsibilities as other prescribers when prescribing.

It is because of the generic and interprofessional nature of the NPS Framework that it is suitable to apply to Eligible Midwives and midwifery practice. All areas of competence described in the NPS Framework apply to prescribing in midwifery practice. The ANMF believes midwives should be required to undertake comprehensive prescribing programs based on the NPS Framework as for all prescribers.

The NPS Framework requires a clinical assessment tool for use with the Framework. A national assessment tool would assist with consistency in determining and assessing competence of prescribing health professionals across, and within, various disciplines including midwifery. Perhaps the greatest benefit of an assessment tool is to contribute to consistency in prescribing outcomes for the public.

Providers of Programs Leading to Endorsement for Scheduled Medicines for Eligible Midwives

Providers of programs leading to endorsement for scheduled medicines for midwives should be higher education providers and ideally those currently offering undergraduate midwifery programs. This is a position that is consistent with other ANMAC accreditation standards requirements.

Naming the Standards

The Scheduled Medicines and Midwifery Professional Practice Review Programs are components of the NMBA pathway to be an Eligible Midwife and, as such, must be ANMAC accredited.

The titling of Part 1 of the Standards should be consistent with giving all midwives the opportunity to undertake an accredited 'midwifery professional practice review program', even if not necessarily intending to seek notation as an Eligible Midwife.

Although Part 2 of the ANMAC draft Standards will lead to endorsement to prescribe scheduled medicines for Eligible Midwives, the name of the Standard should reflect that the program could be available to midwives who may never intend to engage in prescribing or seek notation as an Eligible Midwife.

The ANMF believes the name of the Standards should be:

Accreditation Standards for programs leading to Eligible Midwife

Part 1: Standards for Midwifery Professional Practice Review Programs

Part 2: Standards for Midwifery Scheduled Medicines Programs

Award Level

Education programs leading to Eligible Midwife should be at Graduate Certificate level, which may be offered as components of a Masters degree program. Providing discrete units of study resulting in an AQF registrable qualification, within a Masters pathway, allows for either an exit with a stand-alone qualification and/or credit towards the completion of a Midwifery Masters degree.

Professional Practice Experience

Just as the theoretical components of any prescribing module require student assessment, the midwifery clinical application of prescribing also requires assessment. Professional practice requires assessment of all competency areas of the NPS Framework in a workplace setting. The professional practice experience component of the Midwifery Scheduled Medicines Program should involve working with a range of health professionals involved in the prescribing pathway process. These health professionals should include: existing prescribers, such as nurse practitioners and medical practitioners (including GPs, GP Obstetricians and Obstetricians); and pharmacists.

Professional practice experience should be assessed using a recognised and agreed tool based on the NPS Framework. As mentioned previously, the ANMF considers it is essential for the NPS to develop a national clinical assessment tool to be used in assessing against the NPS Framework for all prescribers of scheduled medicines, including midwives.

Issues, gaps and duplications

It is the view of the ANMF, the primary issue of a Masters degree program to prepare Eligible Midwives, must be addressed. We reiterate our call for the ANMAC accredited programs to be embedded in a formal Masters degree program which mirrors the standards and requirements for endorsement as a Nurse Practitioner.

Conclusion

The ANMF is pleased to take this opportunity to provide advice to the ANMAC, on behalf of our registered midwife members, to the development of the *Accreditation Standards required for Eligible Midwife Programs*. As the largest professional and industrial body for midwives within Australia, the ANMF has a significant interest in midwifery education as it directly relates to workforce. We consider it imperative that registered midwives and Eligible Midwives provide safe and competent care to pregnant and birthing women in this country.

In addition, it is our firm view that we need to prepare a midwifery workforce equipped and willing to work in regional, rural, and remote parts of Australia, to protect the viability of already vulnerable and fast disappearing midwifery services in these areas.

The ANMF looks forward to further participation in the scheduled consultation forums for the review of these Standards.