



14 May 2018

Professor Steve Robson
Chair, Migrant and Refugee Women's Health Partnership
PO Box 1895
Canberra ACT 2601

By email:

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Dear Professor Robson,

Consultation on the draft Competency Standards Framework *Culturally responsive clinical practice: Working with people from migrant and refugee backgrounds*

The Australian Nursing and Midwifery Federation (ANMF) appreciates the opportunity to provide a response to the Migrant and Refugee Women's Partnership consultation on the draft Competency Standards Framework *Culturally responsive clinical practice: Working with people from migrant and refugee backgrounds*.

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 more than 268,500 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.

In Australia nursing and midwifery standards are developed and approved by the Nursing and Midwifery Board of Australia (NMBA). This occurs under the umbrella legislation of the *Health Practitioner Regulation National Law Act 2009* (the National Law) and national registration for health practitioners, which includes all nurses and midwives.

Over the last five years, competency standards for nurses and midwives in Australia have been replaced by standards for practice. This is due to a shift in approach from an indication of the primary learning



outcomes by which to benchmark entry to nursing and midwifery practice, to a description of the standard of practice to be expected for each of the regulated nursing and midwifery titles.

As part of the NMBA's mandate to ensure contemporary relevant standards are understood and used by nurses and midwives, the NMBA develop and approve standards for registration, codes of conduct and ethics, and standards for practice. This forms the professional practice framework for nurses and midwives.

The national nursing and midwifery professional practice framework includes:

Standards for Practice, including:

- Registered nurse standards for practice,
- Enrolled nurse standards for practice,
- Midwife standards for practice,
- Nurse practitioner standards for practice,

Frameworks, including:

- Decision-making framework (DMF),
- Framework for assessing standards of practice for registered nurses, enrolled nurses and midwives,
- Framework for assessing supervised practice re-entry,

Guidelines, including:

- Safety and quality guidelines for private practicing midwives,
- Guidelines for mandatory notifications,

Codes of Ethics, including:

- The International Council of Nurses Code of Ethics,
- The International Confederation of Midwives Code of Ethics

Codes of Conduct, including:

- Code of Conduct for Nurses in Australia,
- Code of Conduct for Midwives in Australia

Registration Standards, including:

- Criminal history,
- English language skills,
- Continuing professional development,
- Recency of practice,
- Professional indemnity insurance,
- Endorsement as a nurse practitioner,
- Endorsement for scheduled medicines for midwives,
- Endorsement for scheduled medicines for registered nurses



The draft Competency Standards Framework, prepared by the Migrant and Refugee Women's Health Partnership, provides information which is already comprehensively addressed in the NMBA professional practice framework for nurses and midwives referred to above. Consequently, this draft Framework would not provide additional assistance to registered and enrolled nurses and midwives in practice.

However, the content of the draft Framework, particularly the information provided as explanatory notes, may provide a useful educational resource for undergraduate Bachelor of Nursing/Midwifery students.

In addition, within the Australian context, the nursing and midwifery professions would not use the term 'cultural responsiveness' interchangeably with the term 'cultural safety', as it is inferred in the document glossary. We suggest you refer to the NMBA Codes of Conduct for nurses and midwives for further information. This work was developed with the advice of the Congress of Aboriginal and Torres Strait Islander Nurses and Midwives (CATSINaM). Further, in terms of language used throughout the draft Framework, we note there is inconsistent reference to 'patients', 'people' and 'person'. We suggest this terminology be reviewed, as the term 'patient' doesn't apply to all contexts of practice and has patronising overtones. We suggest consistent use of the terms 'people' and 'person' throughout.

We appreciate the opportunity to participate in this consultation process and provide our feedback on behalf of our membership. Should you require further information on this matter, please contact Julianne Bryce, Senior Federal Professional Officer, ANMF Federal Office, Melbourne on 03 9602 8500 or julianne@anmf.org.au.

Yours sincerely

Annie Butler
A/Federal Secretary