



Australian
Nursing &
Midwifery
Federation

Submission for the review of the re-entry to the Register Midwife Accreditation Standards

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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 240,000 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.

Currently, the Australian Nursing and Midwifery Federation (ANMF) represents the largest number of 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 32,856 shown in the March 2015 statistics for the Nursing and Midwifery Board of Australia (NMBA)¹.

General comments:

In responding to Consultation paper 1 for the review of the re-entry to the register midwife accreditation standards, the ANMF wishes to emphasise the following points which form the basis for our position:

- Safe and competent care for birthing women and their babies in Australia is of paramount importance;
- We maintain our ongoing support for continuity of care models for midwifery care;
- Access to a known midwife should be available for all pregnant and birthing women regardless of the presence of clinical risk factors;
- Our members wanting to return to the midwifery profession need to have ready access to an affordable re-entry program;
- The re-entry accreditation standards need to be based on the principle of individual learning, acknowledging that participants of these programs have been previously registered as midwives;
- There are currently only two midwifery re-entry programs accredited by ANMAC and approved by the NMBA. They are both Victorian programs and are not currently being conducted by the approved provider. Considering this, the accreditation standards need to find an important balance between ensuring midwives completing re-entry programs are competent and safe to practice, and, ensuring the standard requirements are not too onerous as to prevent education providers electing to offer the program; and,
- A re-entry program should be conducted over a period not greater than three months

Specific comments:

Questions 1 and 2 are not dealt with in this submission as these relate to demographic data.

1. <http://www.nursingmidwiferyboard.gov.au/About/Statistics.aspx>

Question 3

Proposed Criterion 1.1

1.1 Current registration with:

- a. Tertiary Education Quality Standards Agency (TEQSA) as an Australian university or other higher education provider offering an entry to practice midwifery program, or
- b. TEQSA as an Australian university or other higher education provider not offering an entry to practice midwife program that has a formal agreement in place with an Australian university or other higher education provider with current TEQSA registration and offering an entry to practice midwifery program, or
- c. Australian Skills Quality Authority (ASQA) as an Australian registered training organisation that has a formal governance arrangement in place with an Australian university or other higher education provider, which has current registration with TEQSA and offers an entry to practice midwifery program.

Question 3. Do you support the inclusion of the above criterion (a, b and c) in the Re-entry to the Register Midwife Accreditation Standards?

Criterion 1.1a a) Yes b) No

Criterion 1.1b a) Yes b) No

Criterion 1.1c a) Yes b) No

If you answered 'no', please identify your reason(s) and state how you would amend the content of the specific criterion.

ANMF Response

The ANMF supports the inclusion of criterion 1.1, points a, b and c. These inclusions provide assurance that education providers conducting midwifery re-entry programs maintain an important quality standard within an Australian university or the higher education sector. They also enable some flexibility for non-higher education providers to conduct the program in collaboration with an approved TEQSA provider offering an entry to practice midwifery program.

Question 4

Proposed criterion 4.4 to offer further guidance on content inclusion in re-entry to the register midwifery programs.

The program provider demonstrates:

4.4 Program content includes but is not limited to supporting further development and application of knowledge and skills in:

- a. Reflective practice
- b. Research appreciation and translation
- c. Legislative, regulatory and ethical requirements for practice
- d. Assessment, planning, implementation and evaluation of midwifery care
- e. Emergency care including neonatal and maternal resuscitation
- f. Pharmacokinetics, pharmacodynamics and the quality use of medicines within the midwifery scope of practice and context
- g. Health informatics and health technology.

Question 4. Do you support the inclusion of the above criterion in the Re-entry to the Register Midwife Accreditation Standards?

Criterion 4.4a a) Yes b) No

Criterion 4.4b a) Yes b) No

Criterion 4.4c a) Yes b) No

Criterion 4.4d a) Yes b) No

Criterion 4.4e a) Yes b) No

Criterion 4.4f a) Yes b) No

Criterion 4.4g a) Yes b) No

If you answered 'no', please identify your reason(s) and state how you would amend the content of the specific criterion.

ANMF Response

The ANMF supports the inclusion of the outlined items for the proposed criterion 4.4, points a) to g). We request the addition of the following two items, to ensure consistency with the *Midwife Accreditation Standards 2014*, namely:

- Critical analysis and evaluation
- Professional advocacy

Question 5

Proposed criterion 8.11 that stipulates minimum midwifery practice experience requirements are to be approximately 25% of those specified in the Midwife Accreditation Standards.

The program provider demonstrates:

The inclusion of midwifery practice experience in the program, so students can complete the following minimum supervised midwifery practice experience requirements.

'Continuity of care experience' (with recruitment in the third trimester)

a. (iii) engage with a minimum of 2 women—engagement involves attending four antenatal visits, two postnatal visits and, the labour and birth.

'Antenatal care'

b. Attendance at 25 antenatal episodes of care. This may include women the student is following as part of their continuity of care experiences.

'Labour and birth care'

c. Under the supervision of a midwife, act as the primary accoucheur for 7 women who experience a spontaneous vaginal birth, which may include women the student has engaged with as part of their continuity of care experiences.

d. Provide direct and active care to an additional 2 women throughout the first stage of labour and, where possible, during birth – regardless of mode.

'Complex care'

e. Experience in caring for 10 women with complex needs across pregnancy, labour, birth or the postnatal period. This may include women the student has engaged with as part of their continuity of care experiences.

'Postnatal care'

f. attendance at 25 postnatal episodes of care with women and, where possible, their babies. This may include women the student has engaged with as part of their continuity of care experiences.

'Neonatal care'

g. (NB – this is not point 'j' as indicated in the consultation paper) Experience in undertaking 5 full examinations of a newborn infant.

NB: All other criteria remain unchanged and footnotes to these criteria will continue to permit minimum practice requirements being counted more than once.

Question 5. Do you support the inclusion of the above proposed criterion in the Re-entry to the Register Midwife Accreditation Standards?

Proposed criterion 8.11:

Continuity of care experiences a) Yes b) No

Antenatal care a) Yes b) No

Labour and birth care a) Yes b) No

Complex care a) Yes b) No

Postnatal care a) Yes b) No

ANMF Response

The ANMF supports a minimum midwifery practice experience requirement for the re-entry program to be stipulated at 25% of those specified in the *Midwife Accreditation Standards 2014*. As we have previously indicated, the re-entry program ideally should be conducted over a three month period. It is considered critical that the midwifery practice experience within re-entry programs is achievable within the three month timeframe.

We agree the continuity of care experience is an essential part of the midwifery practice experience, therefore the ANMF supports the inclusion of two continuity of care experiences in the re-entry program. However, there will obviously need to be some flexibility to allow completion of these continuity of care experiences as defined in the *ANMAC Midwife Accreditation Standards 2014*. The definition of the term 'engagement' for these experiences needs to be adjusted, to ensure two continuity of care experiences can be achieved during the education program timeframe. In order to achieve this requirement, we recommend that engagement should involve attending at least two, but up to four antenatal visits; one to two postnatal visits and the labour and birth.

Question 6. Please review all standards and criteria and identify any issues, gaps, omissions, duplications or errors.

Standard 1:

No further comment

Standard 2:

No further comment

Standard 3:

A criterion should be included in this standard stating the program length should be no greater than three months (full time equivalent) with some flexibility, including completion timeframe for continuity of care requirements, and, for students who require further support.

To ensure the re-entry standards remain contemporary for the next five years, it is suggested that the terminology 'National Competency Standards for Midwives' is replaced with 'Midwife Standards for Practice' and defined appropriately.

Standard 4:

No further comment

Standard 5:

No further comment

Standard 6:

No further comment

Standard 7:

No further comment

Standard 8:

No further comment

Standard 9:

No further comment

Glossary and abbreviations:

There is an inconsistency noted in the 'glossary and abbreviations' compared to the *ANMAC Midwife Accreditation Standards 2014*. The title of 'regulation impact statement' differs from the 2014 Standards which refers to 'regulatory impact statement'.

The ANMF supports the inclusion of the International Confederation of Midwives (ICM) definition of the Midwife² in the glossary.

The term 'National competency standards for the midwife' has a reference which needs amending for consistency with the *ANMAC Midwife Accreditation Standards 2014*. If, as suggested in our proposed amendment to Standard 3 (at page 5), reference to the 'National Competency Standards for the Midwife' is altered to 'Midwife Standards for Practice', this definition should also be updated.

Conclusion

The ANMF is pleased to have been given this opportunity to provide comment on the midwife re-entry standards, on behalf of our midwife and student midwife members. 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 a viable midwifery workforce.

Midwifery re-entry programs must prepare safe and competent midwives through attainable requirements which reflect contemporary midwifery practice.

The ANMF looks forward to further participation in the scheduled consultation forums for the review of the *Midwifery Re-entry Accreditation Standards*.

2. <http://www.internationalmidwives.org/who-we-are/policy-and-practice/icm-international-definition-of-the-midwife/>