

**Submission by the Australian Nursing and Midwifery Federation**

**ANMF Response to the NMBA Factsheet:  
Maternal, child and family health nurses  
and midwives in Australia. A regulatory  
perspective**

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**Annie Butler**  
**Federal Secretary**

**Lori-Anne Sharp**  
**Federal Assistant Secretary**

**Australian Nursing and Midwifery Federation**  
**Level 1, 365 Queen Street, Melbourne VIC 3000**  
**E: [anmffederal@anmf.org.au](mailto:anmffederal@anmf.org.au)**  
**W: [www.anmf.org.au](http://www.anmf.org.au)**



## Introduction

The Australian Nursing and Midwifery Federation (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 326,000 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.

The ANMF welcomes the opportunity to provide feedback on the recently published Nursing and Midwifery Board of Australia (NMBA) *Maternal, child and family health nurses and midwives in Australia. A regulatory perspective* Fact Sheet (the Fact Sheet).

The ANMF has significant concerns regarding the processes underlying the development and publication of the Fact Sheet.



## Purpose

The NMBA has stated that the purpose of the project was to “identify if there were any risks to the health and safety of the public”. The ANMF would assert that under long standing, well-established standards for practice and scope of practice processes, any risks are already mitigated.

Further, the Fact Sheet states that “*Midwives, working in MCFH that have a postgraduate MCFH qualification are adequately prepared to practise in the MCFH area and should not require any additional regulatory intervention*”. Essentially, that there is no regulatory imperative for the NMBA to act for protection of the public on this matter. It has also previously been the position of the NMBA to not provide specific direction regarding the qualifications, education and experience required to practice in particular or specialty nursing and midwifery contexts of practice.

The Fact Sheet, in attempting to homogenise the national landscape of MCFH practice, fails to recognise the nuances that exist in how MCFH services are organised and delivered in each State and Territory. There are differences in the legislative, industrial, policy and professional MCFH frameworks across jurisdictions. Providing conflicting guidance that does not acknowledge these differences introduces ambiguity and confusion regarding the scope of practice required to fulfil a role. This ambiguity creates clinical risk, the antithesis of the aims of the National Law. Existing regulatory frameworks address these differences by providing clear parameters for nurses and midwives to assess their scope of practice and qualifications against their context of practice on an individual basis.

Taking these aspects into account, it is the position of the ANMF that the development of the Fact Sheet was unnecessary and does not add value to the suite of regulatory documents to guide nursing and midwifery practice.



## The Evidence

The report into maternal, child and family health services (the Report) has not been made publicly available. Similarly, the methodology underpinning the project to review MCFH practice is also not publicly available. Consequently, the evidence used to support the development of the Fact Sheet and inform the recommendations within lacks transparency and credibility.

The Fact Sheet identifies several broad sweeping claims derived from the Report such as “*the quality of current postgraduate MCFH programs vary considerably*”. Without access to the Report, there is no evidence to support such claims. Is the variation in postgraduate MCFH programs resulting in a risk to the public or impacting on the quality of education required for nurses and midwives to meet the inherent requirements of MCFH role? Without the evidence no actions can be taken to address this issue or assess the extent to which there is an issue to be addressed. The Fact Sheet also directs a change to the *National Standards of Practice for MCFHNs in Australia* produced by the Maternal Child and Family Health Nurses Association (MCaFHNA) based on this publicly unavailable evidence. The ANMF suggest that not only is it not within the remit of the NMBA to direct professional organisations to make changes to their statements and positions, but that it is unreasonable to expect an organisation to make changes to an evidence-based publication without access to the evidence to support those changes.

The ANMF reiterates previous requests to publish the research that is purported to have informed the Fact Sheet recommendations to assist all stakeholders to progress the future of MCFH practices. Without this, the evidence base referenced in the Fact Sheet is not demonstrated.

## Consultation

The ANMF also has significant concerns that there was no evidence of any consultation with key stakeholders prior to publication of the Fact Sheet presenting a significant shift from the usual consultation processes undertaken by the NMBA. It is unclear why this project has been undertaken using different processes to the norm. It is essential that key stakeholders have an



opportunity to explore and debate regulation that may impact their profession/s. The ANMF requests the Fact Sheet is removed from the NMBA website, and a full consultation process is undertaken.

## Conclusion

Thank you for the opportunity to provide feedback on the NMBA *Maternal, child and family health nurses and midwives in Australia. A regulatory perspective* Fact Sheet. Due to a lack of transparency, consultation and consistency the ANMF strongly recommend the Fact Sheet is withdrawn and existing regulatory processes, including standards of practice and scope of practice obligations, are allowed to continue to provide the basis for nurses and midwives to determine the suitability of their chosen or proposed context of practice.