

Submission by the Australian Nursing and Midwifery Federation

# Ahpra Accreditation Committee

## Guidance on developing professional capabilities

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Australian  
Nursing &  
Midwifery  
Federation



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## 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 320,000 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 to the Ahpra Accreditation Committee for the public consultation for Guidance on Developing Professional Capabilities.



## Good practice in the development of professional capabilities

### 1. Does any content need to be added to or amended in the draft guidance on developing professional capabilities?

The ANMF recommends amendments to the Shared Professional Capabilities. While we support most of the proposed shared professional capabilities, we consider that capabilities that have clinical relevance, such as performing a comprehensive assessment and safe and effective prescribing, need to remain profession-specific. Health professions and their practitioners will have different levels of engagement with clinically-specific capabilities, based on their individual scope of practice, education, experience and authority. Guidance should consider the potential for shared core capabilities across professions, including cultural safety, person-centred care and interprofessional collaborative practice, and their relevance to the nursing and midwifery professions. The guidance should also specify who it applies to, as it is currently unclear.

Any guidance must account for the uniqueness of nursing and midwifery practice, including the continually evolving scope of practice and role distinctions, such as those evident between registered nurses and nurse practitioners. Such specificity ensures that professional capabilities are not only clearly defined, but relevant to each role.

The guidance must align with current accreditation requirements for nursing and midwifery programs, ensuring that educational curricula are appropriately mapped to the required professional capabilities. Moreover, such guidance should detail specific requirements and update standards for practice to reflect any recent changes in practice or standards.

Any guidance should incorporate insight from nursing and midwifery practitioners, gathered during preliminary consultations, to address any concerns related to governance and ownership of professional capabilities documents. Industrial bodies and professional organisations are the main contacts outside the Boards for many health practitioners, and should be contacted in regards to all stakeholder feedback. Industrial bodies were excluded from the list of relevant stakeholders, and should be included in all appropriate circumstances.



Guidance necessitates regular updates, to reflect regulatory and professional practice changes. This inevitably includes incorporating updates to national and state-based regulations, and consideration of emerging trends that may influence practice.

Lastly, the inclusion of practical examples and case studies relevant to nursing and midwifery is important. Scenario-based guidance assists practitioners and educators to effectively understand the application of professional capabilities in real-world settings.

## **2. Are there any implementation issues the Accreditation Committee should be aware of?**

The ANMF suggests that the Accreditation Committee should consider the following fundamental implementation issues:

- Variation in practice standards across different health professions, including nursing and midwifery, can contribute to inconsistencies in applying and assessing professional capabilities. Any guidance must be adaptable to accommodate the unique needs of each profession. Progressing a generic practice standard across all professions could water down the protections for the community and undermine profession-specific knowledge and skills.
- Ensuring that educational programs align with updated professional capabilities can be a significant task, requiring careful curriculum integration and regulatory compliance to avoid conflicts.
- Resource constraints within accreditation bodies can impact their abilities to effectively implement changes and monitor new standards, highlighting the need for adequate support and training.
- Transitional challenges, including a phased implementation and adjustment period, are crucial to minimise disruption, as well as facilitate a smooth transition for institutions and practitioners.
- The use of international capabilities has the potential to cause public harm. Significant overseas health practitioner recruitment has implications on the international and local healthcare provision landscape, and relying on universal regulations may fast track the process inappropriately.



We note that the Federal government is currently undertaking a significant body of work to improve access to safe and sustainable health services. This includes strengthening nursing workforce planning (Australian Government (Department of Health and Aged Care), 2024) and making more visible the valuable contribution that nurses and midwives make to Australia's health system. We caution against the implementation of shared professional capabilities which may not align with this body of work and hinder efforts to strengthen the nursing and midwifery professions.

### **3. Are there any potential unintended consequences of the draft guidance?**

The ANMF is concerned that several unintended consequences may arise for nurses and midwives. Addressing these issues is fundamental to ensuring that any guidance is effectively implemented and furthermore supports the advancement of the nursing and midwifery professions.

This draft guidance may facilitate the implementation of a multi-disciplinary scope of practice. This will dilute the professions of nursing and midwifery, which remain the largest regulated health workforces dedicated to providing conception-to-death care to all people. These proposed changes also risk devaluing the professional standing of nurses and midwives, and detract from nurses and midwives' scope of practice, including their unique knowledge, skills and focus which are critical to the wellbeing and healthcare outcomes of the people for whom they provide care. Rigid standards could inadvertently narrow the scope of practice, limiting flexibility and adaptability, in response to evolving roles and emerging practices.

Additional documentation and reporting requirements may result in increased administrative burdens. This has the potential to strain education providers and practitioners. Education providers with fewer resources may face challenges in meeting new standards and capabilities, leading to educational inequalities. New graduates may be impacted if discrepancies between current curricula and new guidance are not properly aligned. Variabilities in expectations could also affect workforce mobility and the portability of qualifications across regions.



#### **4. Do you have any general comments or feedback about the draft guidance on developing professional capabilities?**

The draft guidance on developing professional capabilities should prioritise clarity and precision to ensure consistent interpretation and application across health professions. The guidance must be inclusive, addressing the diverse roles within each profession to be broadly applicable and beneficial. Incorporating real-world examples and case studies will help practitioners and educators to soundly understand and implement the guidance.

Ongoing engagement with a wide range of stakeholders, including industrial organisations, regulatory bodies, educational institutions, and professional associations, is crucial in ensuring the guidance reflects current needs and challenges. The guidance should also be flexible, allowing for relevant updates as practices and technologies evolve.

Providing comprehensive support resources, including training materials and implementation guidelines, will facilitate smoother transitions and compliance. Additionally, robust evaluation mechanisms should be established to assess the effectiveness of the guidance and incorporate continuous feedback for improvement. Ensuring alignment with broader health and education policies will help integrate the guidance into existing systems and practices more effectively.

It is currently unclear what is involved in the development phase of the professional capabilities. The ongoing consultation process in the maintenance of professional capabilities is unclear. The ANMF recommends a profession-specific consultation to ensure relevant evidence-based professional capabilities are developed. This process should also apply to the review of existing guidelines.

### **Good practice professional capabilities**

#### **5. Do you agree that the threshold capabilities required for registration should be owned and governed by Ahpra and the National Boards? Why or why not?**

The ANMF supports Ahpra and the National Boards owning and governing all threshold capabilities required for registration. Centralised governance by such bodies ensures consistency and standardisation across regulated professions, maintains alignment with legal



and professional standards, and facilitates coordinated updates in response to emerging trends and advancements. Centralising governance additionally enhances public safety and trust, providing clear and transparent processes for establishing and revising the capabilities.

Ahpra and the National Boards have the regulatory authority and expertise needed to effectively oversee these capabilities, ensuring they are integrated with accreditation standards and educational requirements. This approach provides a cohesive framework for maintaining high standards of practice, accountability, and relevance in the registration process.

**6. Do you support having shared professional capabilities across health professions regulated by the National Scheme? Why or why not?**

The ANMF opposes professional capabilities being shared across health professions regulated by the National Law unless they are very specifically developed. Each profession has distinct roles, responsibilities, and scopes of practice which require specialised practice standards. Shared capabilities may oversimplify and dilute these differences, potentially impacting safety and quality of practice. Inappropriate shared capabilities could blur professional boundaries, leading to role confusion and interprofessional conflicts.

The unique educational and training requirements for each profession may not be adequately addressed by a uniform set of capabilities, potentially affecting the quality of education. Consideration should be given to how the implementation of a shared capability framework would equitably serve all professions, recognising that each profession is regulated by different structures and have distinct membership cohorts. The nursing and midwifery professions, for example, have the largest memberships of other professions but may have less sociopolitical influence due to their predominantly female workforce composition and the historical hierarchical structures of healthcare. Preserving distinct professional capabilities helps to maintain the integrity and expertise of each profession, ensuring alignment with existing regulatory and practice standards. Therefore, while some shared capabilities might offer some benefits, maintaining tailored standards is essential for ensuring that each profession remains effective and appropriately skilled.





## 7. What professional capabilities do you think should be shared across professions?

Regulatory, and legal requirements specific to nursing and midwifery practices should remain distinct to ensure compliance with profession-specific standards. Maintaining these unique capabilities is fundamental for preserving the effectiveness, integrity, and professional identity of both nursing and midwifery disciplines.

Undoubtedly, some professional capabilities are essential to all health professions, as they form the foundation for effective, safe, and compassionate care. Such capabilities include communication skills, ethical practice, critical thinking, and problem solving, collaboration, advocacy, and evidence-based practice. Whilst such overarching, shared capabilities might offer some benefits, the ANMF suggests that Ahpra and the National Boards develop and maintain consistent tailored standards, to ensure that each profession remains effectively and appropriately skilled.

The ANMF support is limited to the shared professional capabilities outlined in the consultation paper (p. 12) that are not clinically specific, namely:

- Culturally safe care for Aboriginal and Torres Strait Islander Peoples;
- Communicating clearly, respectfully, sensitively and effectively;
- Interprofessional collaborative practice;
- Professionalism, ethics and working within legislative and regulatory requirements; and
- Lifelong learning.

Specialised clinical skills, such as advanced wound care for nurses, or complex birth procedures for midwives, must remain unique to ensure expertise in each area. The scope of practice for nurses and midwives explicitly defines specific functions and responsibilities, which should be preserved to reflect distinct contributions to care. Advanced knowledge areas are crucial for maintaining individualised scopes of practice. Caution should be exercised when increasing the capabilities of any profession to ensure protection of the public.

The ANMF notes, with respect to 'interprofessional collaborative practice' that we consider this to be distinct from 'collaborative arrangements'. We have advocated strongly for the



removal of ‘collaborative arrangements’ for nurse practitioners and midwives from legislation and we strongly endorse the legislative changes that will take effect in November 2024. We oppose any moves to reinstate ‘collaborative arrangements’ that require nurse practitioners and midwives to enter into a ‘collaborative arrangement’ with a medical practitioner, as a prerequisite to providing services subsidised by the Medicare Benefits Schedule and to prescribe medicines under the Pharmaceutical Benefits Scheme.

## Conclusion

Thank you for this opportunity to provide feedback to the Ahpra Accreditation Committee on the Guidance on Professional Capabilities. The ANMF strongly advocates for the refinement and enhancement of the draft guidance on professional capabilities for nursing and midwifery. Our insights underscore the need for clarity, specificity, and inclusivity to ensure that professional capabilities reflect the unique demands and responsibilities inherent in our professions. We believe that while shared capabilities can foster interprofessional understanding and collaboration, it is crucial to maintain distinct standards that safeguard the integrity and effectiveness of nursing and midwifery practice.

The proposed guidance must be adaptable to the evolving landscape of healthcare and ensure alignment with current accreditation requirements. By incorporating feedback from practitioners and engaging diverse stakeholders, we can create a robust framework that not only supports educational institutions but also enhances the quality of care provided to the community. Ongoing dialogue and updates will be essential to navigate the complexities of professional capabilities in a manner that promotes safety, quality, and well-being of those for whom we provide care.