



Australian
Nursing &
Midwifery
Federation

Submission to the Australian Nursing and Midwifery Accreditation Council for the Review of the Enrolled Nurse Accreditation Standards – Second Consultation Paper

24 February 2017

Lee Thomas
Federal Secretary

Annie Butler
Assistant Federal Secretary

Australian Nursing & Midwifery Federation
PO Box 4239 Kingston ACT 2604
T: 02 6232 6533
F: 02 6232 6610
E: anmfcanberra@anmf.org.au
W: www.anmf.org.au

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 which now stands at over 258,000 nurses, midwives and assistants in nursing, our members are employed across all urban, rural and remote locations, in both the public and private health and aged care sectors.

The ANMF has an enrolled nurse membership of over 38,000. This represents more than half of all enrolled nurses on the national register, according to the total number of 60,830 shown in the September 2016 statistics for the Nursing and Midwifery Board of Australia (NMBA)¹. We therefore welcome the opportunity to provide advice to the second round of public consultation for the review of the Australian Nursing and Midwifery Accreditation Council (ANMAC) Enrolled Nurse Accreditation Standards. The ANMF has a critical interest in accreditation standards which ensure enrolled nurses are educated and qualified for safe, competent and ethical practice and meet the NMBA Enrolled Nurse Standards for Practice. It is essential there are appropriate selection processes to optimise student's success in the program and to assist retention of a viable enrolled nurse workforce.

Comments

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

Question 3

Version 2 of the DRAFT Enrolled Nurse Accreditation Standards

Please consider proposed new wording of the following criteria (in **blue text**):

- **Sub-criterion 6.1(a) now specifying a minimum level of English language skills required by students on entry to an enrolled nurse program of study.**

The program provider demonstrates:

Applicants are informed of the following before accepting an offer of enrolment:

- a. Specific requirements for entry to the program of study, including **formal English language skills test results equivalent to those specified in the NMBA Registration standard for English language skills**

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

Do you support the inclusion of proposed changes to sub-criterion 6.1a (above), which will introduce into the revised Enrolled Nurse Accreditation Standards a minimum level requirement for students' English language skills on program entry?

Answer: Yes but this wording remains confusing.

ANMF Response:

The following amendment to point 6.1(a) and a new 6.1 (b) is suggested:

The program provider demonstrates:

- 6.1 Applicants are informed of the following before accepting an offer of enrolment:
- a. Specific requirements for entry to the program of study, including [the NMBA Registration standard for English language skills](#)
 - b. [For those students that would be required by the NMBA to undertake a formal English Language skills test, this must be achieved to the specified level prior to commencement of the program](#)

It is the view of the ANMF that those students who would be required by the NMBA to complete Pathway 3 - one of the specified English Language Tests to achieve test results detailed in the Board's Standard for registration, should be required to do this prior to commencing the program. This will ensure students selected for the program are able to complete the theoretical requirements and workplace experience as required, without delays. It also positions students well to successfully complete the course requirements and to gain registration following completion.

Introducing this requirement would not disadvantage students who will be using Pathway 1 (the primary language pathway) or Pathway 2 (the extended education pathway) to meet the Board's *Registration Standard: English Language Skills*.

Consideration will need to be given to length of time English language test results will be valid for with the change to requiring successful completion of the test prior to program commencement. Current NMBA requirements only allow for more than two years if students:

*have been continuously enrolled in a **Board approved program of study**, which commenced within 12 months of the date of the test result and undertook subjects in each semester, with no break from study apart from the education provider's scheduled holidays*

This would allow little or no room for legitimate absence due to student and/or family illness or injury which may occur during the program.

Question 4

By specifying a minimal level of English language skills at program entry it is proposed criterion 5.6 is no longer required.

Criterion 5.6 Student communication and English language skills are assessed before undertaking workplace experience.

Do you support the *removal* of criterion 5.6 from the revised Enrolled Nurse Accreditation Standards?

Answer: Yes

ANMF Response:

The ANMF considers that those students who would be required by the NMBA to complete one of the specified English Language Tests to achieve test results detailed in the Board's Standard for registration, should be required to do this, not just prior to workplace experience, but before they are accepted into the program. As the cost for English language testing will be incurred by students as a requirement for registration, the ANMF believes students should complete this testing to the level required by the NMBA prior to commencing the program. Education providers would then be unable to accept students into the program when they have little or no prospect of meeting the NMBA English Language Skills Standard in order to gain registration on completion.

Question 5

Version 2 of the DRAFT Enrolled Nurse Accreditation Standards

Please consider proposed new wording of the following criteria (in blue text):

- ***Criterion 6.3* now specifying a minimum level of language, literacy and numeracy skills required by students on entry to an enrolled nurse program of study**

The program provider demonstrates:

Students, prior to commencing the program, are able to provide evidence* of sufficient literacy and numeracy skills to be able to successfully undertake academic experience and workplace experience requirements throughout the program.

*Footnote: Evidence refers to a language, literacy and numeracy (LLN) test result from an Australian Government approved provider (e.g., ACER, bksb) at exit level 3 in the Australian Core Skills Framework in both reading and numeracy. Australian students who have completed an Australian Grade 12 certificate or students who have undertaken a formal English language skills test (e.g., IELTS) that meets program entry criteria, need only undertake the numeracy component of the LLN test.

Do you support the *inclusion* of proposed wording changes to criterion 6.3 (above), which will introduce into the revised Enrolled Nurse Accreditation Standards a minimal level requirement for students' language, literacy and numeracy skills on program entry?

Answer: Yes, however amendments to the footnote are required.

ANMF Response:

The ANMF supports the requirement that students provide evidence of sufficient literacy and numeracy skills prior to commencing the program. This will ensure students have the necessary foundation knowledge and skills for the theoretical and practice components of the program.

The specification that the language, literacy and numeracy (LLN) test result must be from an Australian Government approved provider at exit level 3 in the Australian Core Skills Framework in both reading and literacy, is supported.

As completion of English in the Australian Grade 12 certificate is not compulsory in all States and Territories, the footnote should be amended to specify that Australian students who have successfully completed Australian Grade 12 certificate English, need only undertake the numeracy component of the LLN test. Also, Australian students who have successfully completed Australian Grade 12 Mathematics should not be required to complete the numeracy component of the LLN test from an Australian Government approved provider.

Question 6

Please review all standards and criterion in the second draft of the Enrolled Nurse Accreditation Standards and provide feedback in relation to identified issues, gaps, omissions, duplications or errors.

ANMF response:

Standard 1: The additional wording in criteria 1.3 referencing the nationally-recognised health training package is supported. No further comment.

Standard 2: No further comment.

Standard 3: No further comment.

Standard 4: Amendments made are supported. No further comment.

Standard 5: Amendments made are supported. No further comment.

Standard 6: Amendments made are supported. No further comment.

Standard 7: Staff teaching enrolled nurse practice units should only include those with current Australian general registration as a registered nurse. No further comment.

Standard 8: Amendments made are supported. No further comment.

Standard 9: No further comment.

Glossary:

In the definitions, reference is made to the registered nurse as (registered nurse, division 1) and the enrolled nurse as (registered nurse, division 2). Although these terms are included in the National Law, this is confusing and not common terminology. It is no longer necessary to use these terms as qualifiers because the protected titles of registered nurse and enrolled nurse rest on their own merits. These terms in brackets in the definitions of the registered nurse and the enrolled nurse should be removed to avoid continued confusion of titles.

The definition of 'workplace experience' in the glossary should stipulate that this experience must actually take place in a practice setting and is not inclusive of simulation activities. The definition should state:

Workplace Experience – is a component of nursing education, not inclusive of simulation activities, that students are required to successfully complete in a practice setting, so as to foster sound clinical judgement when applying theoretical knowledge to practice and to support demonstrated achievement of the NMBA *Enrolled nurse standards for practice*.

Conclusion

The ANMF appreciates the opportunity to provide comment to the review of the Enrolled Nurse Accreditation Standards second consultation paper, on behalf of our significant cohort of enrolled nurse and student enrolled nurse members. As the largest professional and industrial body for enrolled nurses in Australia, the ANMF has a substantial interest in enrolled nurse education as it directly relates to a viable nursing workforce.

Enrolled nurse education programs must enable students to meet the NMBA Enrolled Nurse Standards for practice and prepare safe and competent enrolled nurses through attainable requirements which reflect contemporary nursing practice.

The ANMF looks forward to further participation in the summative consultation forum to be held in Brisbane on 7 March 2017.