



Australian
Nursing &
Midwifery
Federation

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

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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 249,000 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 60,892 shown in the June 2015 statistics for the Nursing and Midwifery Board of Australia (NMBA)¹. We therefore welcome the opportunity to provide advice to the first 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 students 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 1 DRAFT Enrolled Nurse Accreditation Standards

Proposed wording for criterion 3.6 to specify the minimum number of workplace experience hours required in all enrolled nurse programs.

The program provider demonstrates:

A minimum of **400** hours of workplace experience, not inclusive of simulation activities, incorporated into the program and providing exposure to a variety of health-care settings that support achievement of the Enrolled Nurse Standards for Practice.

Question 3. Do you support the inclusion of the proposed criterion 3.6 in the revised enrolled nurse accreditation standards?

Criterion 3.6 a) Yes

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

ANMF Response:

The ANMF considers the most critical feature of workplace experience for all health disciplines is its quality. In particular, when nursing and midwifery students experience well managed workplace experience in a positive learning environment, they are more likely to want to stay in the health workforce. The national accreditation standard under review specifies the program provider demonstrates “a minimum of 400 hours of workplace experience, not inclusive of simulation activities...” This standard preserves the integrity of clinical placement time so that other experiences, for example, simulated learning, become additional experience rather than replacing placement in a clinical environment. We acknowledge there is a dearth of formal research to guide the optimal amount of workplace experience required to demonstrate safe, competent practice; and, that the critical issue is the quality of the workplace experience rather than the quantity of hours spent on clinical placement. However, there is now consensus of expert opinion in this country to support stipulation of a minimum number of workplace experience hours as it applies to all nursing curriculum.

The ANMF believes there should be a minimum number of hours set, and specified in the national accreditation standard, as a safety net for maintaining the education program’s integrity in preparing a competent practitioner. Insufficient hours of workplace experience will compromise the student’s ability to be able to demonstrate competence.

The ANMF endorses the position that when simulation is included in a student’s professional experience it must be complementary and in addition to the minimum requirement of 400 hours workplace experience. The student can learn technically correct ways of doing things in a simulated environment but needs the workplace experience to learn and apply individualised communication skills, clinical judgement, and intervention. While the ANMF is supportive of simulated learning laboratories for students of nursing and midwifery programs, it is imperative that these environments are not relied on as a component of minimum workplace experience. The minimum workplace experience hours should continue to exclude simulation activities.

It is the view of the ANMF that Standard 3: Program development and structure, Criterion 3.6, continue to specify the requirement for a minimum of 400 hours of workplace experience, not inclusive of simulation activities, incorporated into the program and providing exposure to a variety of health-care settings that support achievement of the NMBA Enrolled Nurse Standards for Practice.

Question 4

Version 1 DRAFT Enrolled Nurse Accreditation Standards

Proposed criteria to enable content found in the National Health Training Package and the current accreditation standards to be included within the draft Enrolled Nurse Accreditation Standards.

The program provider demonstrates:

4.2 The central focus of the program is enrolled nursing practice, comprising core health professional knowledge and skills and specific enrolled nursing practice knowledge and skills that are evidence based and incorporate national and regional health priorities, health research, health policy and reform.

- 4.4 Program content supports the development and application of knowledge and skills in**
- a. analytical and reflective practice**
 - b. quality and safety principles**
 - c. research appreciation and translation**
 - d. legal and ethical issues in health care**
 - e. health informatics and health technology.**
- 4.5 Inclusion of subject matter that gives students an appreciation of the diversity of Australian culture, develops their knowledge of cultural respect and safety, and engenders the appropriate skills and attitudes.**
- 4.6 Inclusion of a discrete unit specifically addressing Aboriginal and Torres Strait Islander peoples' history, health, wellness and culture. Health conditions prevalent among Aboriginal and Torres Strait Islander peoples are also appropriately embedded into other units within the program.**
- 4.8 Elective units² of competence in the program are relevant to the communities' health priorities.**

Question 4. Do you support the inclusion of proposed program content as specified in the following criteria in Standard 4 of the draft Enrolled Nurse Accreditation Standards?

- Criterion 4.2 a) Yes**
- Criterion 4.4 b) No**
- Criterion 4.5 a) Yes**
- Criterion 4.6 a) Yes**
- Criterion 4.8 a) Yes**

ANMF Response:

Criterion 4.4:

In accordance with the new HLT54115 Health Training Package (HTP) qualification and the NMBA Enrolled Nurse Standards for Practice, the expectation of an enrolled nurse in relation to point a. analytical and reflective practice, would be to read and analyse a contemporary research article, relevant to their area of practice. They would then be expected to reflect upon their reading for the purpose of embedding new information into their own practice. The level of analytical and reflective practice expected of an enrolled nurse would be different to the level expected of a registered nurse.

The ANMF does not support the inclusion of the term 'translation' in point c. research appreciation and translation. This should be removed. There needs to be consistent language between the ANMAC Enrolled Nurse Accreditation Standards and the NMBA Enrolled Nurse Standards for Practice. The NMBA Standard (8) requires that enrolled nurses 'provide nursing care that is informed by research evidence'. There is no suggestion that the enrolled nurse undertakes research translation without the guidance of the registered nurse. According to the Board's Standard, the enrolled nurse 'incorporates evidence for best practice as guided by the registered nurse or other appropriate health professionals'.

² Elective units here mean any approved units that are not part of core units.

Although point e. health informatics and health technology is supported, this content is not currently in the new HLT54115 Health Training Package qualification. The ANMF is unsure how education providers would demonstrate this requirement. It would have to be offered in addition to the program content of the new HLT54115 Health Training Package qualification.

Criterion 4.6:

The inclusion of a discrete unit specifically addressing Aboriginal and Torres Strait Islander peoples' history, health, wellness and culture; and, the embedding of health conditions prevalent among Aboriginal and Torres Strait Islander peoples appropriately into other units within the program, is strongly supported. It is the view of the ANMF that this is of central importance to all undergraduate and postgraduate nursing and midwifery education programs.

Question 5

Version 1 DRAFT Enrolled Nurse Accreditation Standards

Question 5. What in the current system would facilitate program providers assessing students' English language skills prior to undertaking workplace experience?

ANMF Response:

It is the view of the ANMF that program providers would assess students' English language skills prior to undertaking workplace experience if this was a requirement stipulated in the ANMAC Enrolled Nurse Accreditation Standards.

There should be a national mandatory pre-entry test for the Diploma of Nursing that must be used by all program providers to assess literacy, numeracy and English writing skills such as the VETASSESS Test. However, even where this is currently used, this test is set at too low a level for the literacy and numeracy demands of both the theoretical and workplace content of the Diploma of Nursing.

Question 6

Version 1 DRAFT Enrolled Nurse Accreditation Standards

Question 6. What in the current system would be a barrier to program providers assessing students' English language skills prior to undertaking workplace experience?

ANMF Response:

It is the concern of the ANMF that currently students are accepted into Diploma of Nursing programs either having undertaken no assessment of literacy, numeracy and English writing skills or the VETASSESS Test. This Test is currently pitched at entry into AQF level 2 and 3 qualifications and is therefore set at too low a level to assess the required literacy and numeracy necessary to achieve an AQF level 5 outcome. These students may well complete the qualification, still unable to meet the NMBA English Language Skills Registration Standard.

Program providers may oppose this testing as it could result in a reduced number of eligible program participants and subsequent loss of revenue for the program.

English proficiency is required to demonstrate the communication skills, safety and competence during workplace experience that is necessary to meet the NMBA Enrolled Nurse Standards for Practice. There must be a clear expectation on commencement of a program of study that, in order to be able to meet the NMBA Enrolled Nurse Standards for Practice, enrolled nursing students must be able to demonstrate English Language proficiency to a national mandatory preset level.

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, they 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 English Language Skills Standard in order to gain registration on completion.

Question 7. Do you support criterion 5.6 specifying a minimum level of English language skills that students would be required to demonstrate prior to undertaking workplace experience?

a) Yes

ANMF Response:

It is the view of the ANMF the minimum standard for English language skills required for registration in Australia should be required on entry to a program of study.

Question 8. If you answered 'yes' to question 7, please identify what you would consider an appropriate minimum level of English language skills that students would be required to demonstrate prior to undertaking workplace experience?

ANMF Response:

All students should be assessed and achieve a minimum pass level in a revised national VETASSESS Test for literacy, numeracy and English writing skills prior to commencing the program. This Test should be pitched at an AQF level 5 standard and include an oral/verbal component. This will ensure students selected for the program are able to complete the theoretical requirements and workplace experience as required with no delay.

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 also be required to do this prior to commencing the program.

Question 9. Please review all standards and criteria in the first draft of the Enrolled Nurse Accreditation Standards and provide feedback in relation to identified issues, omissions, gaps, duplications or errors.

ANMF Response:

Standard 1: No further comment

Standard 2: No further comment

Standard 3:

Criteria 3.3 should state '...required graduate Standards', not competencies.

Standard 4: No further comment

Standard 5:

Criteria 5.13 should remove the term 'competence' in this sentence as the 'Standards for Practice' are no longer 'Competency Standards'.

Standard 6:

It is essential enrolled nursing students have the foundation numeracy skills to successfully complete the medicines component of the program. The ANMF has received feedback indicating numeracy remains an issue for students' success.

Criteria 6.1 a. should state 'specific requirements for entry to the program of study, including English language proficiency and numeracy skills'.

Criteria 6.3 should state 'Students have sufficient English language proficiency, communication skills and numeracy capability to be able to successfully undertake academic experience and workplace experience requirements throughout the program.'

Standard 7: No further comment

Standard 8: No further comment

Standard 9: No further comment

Glossary:

The terms Australian university and Graduate competency outcomes are not used in the Standards and should be removed. Should the term Graduate competency outcomes be retained, it should be amended to state: 'knowledge, skills, behaviours and attitudes possessed by graduating students that will enable them to meet the Enrolled Nurse Standards for Practice'.

Conclusion

The ANMF appreciates the opportunity to provide comment to the review of the Enrolled Nurse Accreditation Standards first 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 prepare safe and competent enrolled nurses through attainable requirements which reflect contemporary nursing practice.

The ANMF looks forward to further participation in the scheduled consultation forums in Melbourne, Adelaide, Sydney and Brisbane for the review of the ANMAC Enrolled Nurse Accreditation Standards.