



australian  
nursing federation

Submission to Consultation Paper

Proposed Arrangements for Specialists within the National  
Registration and Accreditation Scheme for the Health  
Professions

February 2009

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## **INTRODUCTION**

The Australian Nursing Federation (ANF) was established in 1924. The ANF is the national union for nurses and midwives, with Branches in each State and Territory of Australia.

The ANF is also the largest professional and industrial organisation in Australia, with a membership of over 170,000 nurses and midwives, employed in a wide range of enterprises in urban, rural and remote locations in both the public and private sectors. The ANF's core business is the industrial and professional representation of our members and of the industry of nursing and midwifery.

The ANF participates in the development of policy in nursing, nursing regulation, health, community services, veteran's affairs, education, training, occupational health and safety, industrial relations, immigration, foreign affairs and law reform.

We refer to your paper of 21 January 2009 inviting comments on the 'Proposed Registration Arrangements' to be submitted to the Practitioner Regulation Subcommittee by 20 February 2009. The ANF appreciates the extension of time given for completion of the submission.

The nursing and midwifery professions continue their strong support for the establishment and implementation of a national regulation and accreditation scheme, ensuring protection of the public and maintaining the highest standards of nursing and midwifery services through a transparent and well designed model.

The eight state and territory Branches have reached a consensus view in relation to the matters raised in your correspondence and we are pleased to provide the following comments. The numbering of our submission reflects that of your consultation paper.

## **GENERAL COMMENTS**

The ANF appreciates the efforts of the Practitioner Regulation Subcommittee to invite further consultation from key stakeholders on the proposed arrangements for specialists in response to feedback received which highlighted the need for clarification of these arrangements. We note the improvements in the amended proposal and offer in principle support to most of the amendments. However, there are some proposals even as amended which continue to raise concerns for the ANF: these specific concerns are outlined below.

## **SPECIALIST ENDORSEMENT**

### **Registration arrangements consultation paper – Proposal 10.1.1**

Supported with a clarification that the standards developed by the NMBA are 'standards for accreditation of courses leading to registration or endorsement' by the NMBA.

### **Registration arrangements consultation paper – Proposal 12.1**

Supported. In addition we remind the committee that in many states there are nurses who have a range of endorsements that must be continued. These include but are not limited to;

- mental health nurse;
- enrolled nurse medication endorsement;
- immunisation; and
- rural and isolated practice.

### **Accreditation arrangements consultation paper – Proposal 3.4.3**

The ANF supports the proposal for the national boards to determine how the current registration status of individual registrants should translate to the new scheme.

The ANF supports the principle of open and transparent consultation with relevant stakeholders regarding developments in practice and professional and accreditation standards. However, the ANF cannot offer unqualified support to the proposal that a change to scope of practice or a new endorsement for a regulated profession should require consultation with all boards. This proposal could provide an avenue for professional disputations and block advances in practice by health professions irrespective of the benefit these advances and developments may bring to the practice of professionals or to the delivery of health care and the community.

## **CONTINUING COMPETENCE AND/OR CONTINUING PROFESSIONAL DEVELOPMENT REQUIREMENTS**

### **Registration arrangements consultation paper – Proposals 9.2.1 & 9.2.2**

The ANF supports the concept of continuing competence and/or continuing professional development requirements in principle. The public has a right to expect that regulated health professionals demonstrate continuing competence throughout their careers and the role of regulatory authorities is to establish mechanisms which promote demonstration of continuing competence.

There are concerns regarding the proposed requirements for both general and specialist registrants to demonstrate competence at the time of annual renewal of registration. There is a lack of consistency in current approaches by jurisdictional nurse regulatory authorities on assessment of continuing competence.

While it is appreciated a significant amount of work regarding continuing competence in nursing and midwifery has been undertaken across the country, it is considered that many of the mechanisms currently in place or being proposed may not provide accurate demonstrations of continuing competence by nurses and midwives. Many of the systems in place in jurisdictions would not be able to cope with the size of the nursing and midwifery workforce in the larger jurisdictions to be dealt with at an annual renewal. The ANF would support further discussion between the profession and the NMBA on this issue, with a transition period post July 2010.

The introduction of requirements which resulted in onerous burdens, both financial and otherwise, on nurses and midwives to participate in processes and which are not able to achieve stated goals would be unacceptable.

## **REGISTRATION OF SPECIALISTS (Including area of need specialists)**

### **Registration arrangements consultation paper – Proposals 7.1 & 7.2**

The ANF supports the general restructure of this proposal but we do not support limited registration for either 'specialist practice' or 'area of need'. We are strongly opposed to these components, as we believe they have the potential to significantly undermine nurses and midwives and nursing and midwifery, in particular nurse practitioners. These two proposals risk a situation where people with inappropriate qualifications could be given 'limited registration' as a nurse or midwife. For example the wording 'to practice independently in a specialty' suggests that in certain circumstances a person could be registered as a pseudo nurse practitioner.

If nurses need to be confined to an area of practice they should be given general registration with conditions on their practice.

The area of need category raises the same concerns now as it did in the initial proposal. Our position is therefore unchanged, particularly given budgetary environments in health. Providing for individuals or groups of people to gain registration in nursing without appropriate qualifications, experience or competence is not supported by the ANF and is not in the public interest or public safety. This proposal should be confined to medicine where it can be controlled and supervised.

## **SCOPE OF PRACTICE**

### **Registration arrangements consultation paper – Proposal 10.3.1**

As stated above with reference to Proposal 3.4.3 the ANF supports the principle of open and transparent consultation with relevant stakeholders regarding developments in accreditation standards for courses leading to registration and endorsement. However, we cannot offer unqualified support to the proposal that a change to scope of practice or a new endorsement for a regulated profession should require consultation with all boards.

Thank you for the opportunity to respond to the consultation paper, we look forward to the further discussions regarding these important issues.

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