



30 January 2012

Ms Donna Mowbray
Director of Research, Innovation and Policy
Australian Nursing and Midwifery Accreditation Council
PO Box 400
Canberra City ACT 2601

Dear Ms Mowbray

ANMAC Second Consultation Paper: Review of the Registered Nurse Accreditation Standards

Thank you for your invitation to the Australian Nursing Federation (ANF) to provide feedback on the second consultation paper for the review of the registered nurse accreditation standards.

As the largest professional and industrial organisation in Australia, the ANF has, on behalf of our over 215,000 members: nurses, midwives and assistants in nursing, a genuine interest in all aspects relating to the education of the nursing and midwifery professions. Since inception in 1924, and throughout its existence, the union has maintained a firm stance on the importance of a high standard of education for nurses and midwives.

ISSUE 1: UNIVERSITY QUALITY ASSURANCE

Question 1: Should the Registered Nurse Accreditation Standards require that Program Providers are registered and accredited by TEQSA as a university or should the Standard remain silent on this issue as worded above (i.e. applicants can be in any of the categories currently proposed by TEQSA as long as they are accredited to deliver a bachelor qualification as a minimum)?

ANF response:

The Registered Nurse Accreditation Standards must require that Program Providers are registered and accredited by TEQSA as a university.

ISSUE 2: UNIVERSITY-BASED DEGREE

Question 2: Should the Standard reflect the requirement for a bachelor of nursing degree to be provided by a university only, or should it remain silent on this issue as worded above?

ANF response:

The Standard must reflect the requirement for a Bachelor of Nursing degree to be provided by a university only.

The industrial and professional organisation for nurses and midwives in Australia

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ANF Journals

Australian Nursing Journal
Australian Journal of Advanced Nursing
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ABN 41 816 898 298



Rationale for ANF response to ISSUE 1 & 2: (see complete submission November 2011)

In 2009 the national accreditation standards for registered nurses were developed and endorsed by the nursing profession. The standards included the criterion that "...Bachelor degree in nursing courses must show evidence of Australian university quality assurance and accreditation" (Standard One: Governance).

The Coalition of National Nursing Organisations, a diverse group of more than 50 nursing organisations, prepared and endorsed a Position Statement on Undergraduate Nursing Education in Australia in October 2009.¹ This position statement endorses the conducting of undergraduate nursing programs leading to registration, within the university sector.

The ANF argues the corollary of the foregoing is that the outcome of this current review of national accreditation standards should be maintenance of the dominant view of the nursing and midwifery professions – that is, the retention in the standards that Bachelor of Nursing and Midwifery programs be conducted in the university sector.

ISSUE 3: MINIMUM WORKPLACE EXPERIENCE HOURS AND SIMULATION

Question 3: Can simulation be used to substitute for a proportion of workplace experience hours or only as an adjunct? If as a substitute, what proportion of workplace experience hours can be substituted by simulated experience?

ANF response:

Simulation should be used only as an adjunct to clinical experience, and should NOT be used as substitute.

Rationale for ANF response to ISSUE 3: (see complete submission November 2011)

It is the position of the ANF that when simulation is included in a student's professional experience it must be complementary and in addition to clinical placements in practice areas. The student can learn technically correct ways of undertaking procedures in a simulated environment but needs the practice area for learning and applying individualised communication skills, clinical judgement, and intervention.

Simulated learning laboratories for students of nursing and midwifery programs are supported for development of skill proficiency. This is as preparation for, but not as a substitute for, actual clinical experience.

ISSUE 4: MINIMUM STANDARD OF ENGLISH PROFICIENCY

Question 4: Should a minimum standard of English proficiency be required to qualify for entry to a program of study or, alternatively, upon completion of the program of study? If yes, should it be equivalent to that required for registration in Australia i.e. equivalent to IELTS Band 7 or above?

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ANF response:

The minimum standard of English proficiency for registration in Australia should be required on entry to a program of study.

Rationale for ANF response to ISSUE 4

English proficiency is required to demonstrate clinical competence which includes communication skills.

There needs to be clear expectations on commencement of a program of study that in order to be able to achieve clinical competence you must be able to demonstrate English Language proficiency to a preset level.

Should you require any additional information or wish to discuss this matter further please contact Julianne Bryce, Senior Federal Professional Officer, on (03) 9602 8500 or julianne@anf.org.au.

Yours sincerely,

A handwritten signature in black ink that reads 'Lee Thomas'.

Lee Thomas
Federal Secretary

¹ Council of National Nursing Organisations. 2009. Position Statement: *Undergraduate Nursing Education in Australia*. Available at: http://www.conno.org.au/pdf/CoNNO_Position_Statement_UG_Nursing_Education.pdf

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