



Australian  
Nursing &  
Midwifery  
Federation

Submission to consultation by the Australian  
Government Department of Health on the  
draft National Immunisation Education  
Framework for Health Professionals

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## **Introduction**

The Australian Nursing and Midwifery Federation (ANMF) is the largest professional and industrial organisation in Australia for nurses and midwives, with a combined membership of over 250,000 across State and Territory Branches. Our members are employed in urban, regional, rural and remote locations in both the public and private health and aged care sectors. The core business of the ANMF is the professional and industrial representation of our members and the professions of nursing and midwifery.

With over 358,000 nurses and midwives employed throughout the country, making up over 50% of the health workforce, these health professionals have incredible reach into, and relevance within, the Australian community. This significant cohort of the Australian health workforce has an influential role to play in spreading the message about the importance to the whole community of protection against communicable diseases.

### **Registered nurse and midwife immunisers**

Due to their large numbers, and wide range of practice settings, registered nurses and midwives currently undertake a vital role in providing public health education, including the provision of immunisation programs. In fact, the ANMF contends nurses and midwives are an underutilised resource in providing accessible immunisation programs aimed at increasing immunity levels within the community. (NB. Registered nurses and midwives includes nurse practitioners and midwives with scheduled medicines endorsement, throughout this submission)

The benefits of more fully utilising nurses and midwives as immunisers is that as the largest cohort of the health care workforce, they are the most accessible, and, they have a comprehensive educational preparation and broad scope of practice. Accordingly, they provide great flexibility for the community in accessing immunisations; they can target population groups (home visiting to the elderly or renal patients); they can be opportunistic (in maternal and child health nurse clinics and remote area locations); they provide immunisation in free of charge environments (such as through local municipal councils, community health centres/clinics and schools), giving access to people in the community who may not utilise a General Practice.



All registered nurses and midwives have a professional and legislative framework which underpins their practice. This is particularly pertinent to their role as nurse and midwife immunisers thereby ensuring there is a public safety mechanism for immunisation programs regardless of the setting.

Nurse and midwife immunisers provide:

- *Safety and quality related to medicines management.* This includes: completion of preparatory education; undertaking of ongoing professional development; adherence to professional practice standards, codes and guidelines; and maintenance of competence to practice.
- *Person-centred care.* The prime focus for administering immunisations must be the needs of the person/ child who is the recipient of that care. This includes such aspects of need as: physical, psychosocial, economic, cultural, spiritual, support networks, age, access to medicines, and the monitoring of adverse events.
- *Access and efficiency – timeliness of care.* Nurse and midwife immunisers offer improved flexibility in access to care for consumers of health and aged care services. This is in terms of access to medicines and geographical accessibility, which is especially applicable to isolated and remote settings as nurses/midwives are often the only health professional practising in these areas. Efficiencies could be gained for health services by the reduction of duplication when consumers must visit more than one health service in order to receive their vaccination.

## **Specific comments on the National Immunisation Education Framework for Health Professionals**

### **‘Regulatory frameworks’, page 2:**

The ANMF is a strong supporter of the National Immunisation Program with its aim of improving vaccination rates and thereby reducing the spread of vaccine preventable diseases. Currently each jurisdiction in Australia has its own policy on education, qualifications, authorisation, and legislative requirements prescribed by their departments of health, for immunisers. In addition, there is differing drugs and poisons legislation across States and Territories.



These variations are an on-going concern to the ANMF as our registered nurse and midwife members often either relocate from one State/Territory to another or work across jurisdictional borders. For those who are immunisers, this entails time-consuming and potentially expensive re-authorisation to meet the requirements of multiple States/Territories.

While the solutions may seem complex the ANMF maintains it is timely to begin serious conversations regarding national standardisation of education, qualifications and authorisation for immunisers, as well as the harmonisation of drugs and poisons legislation as it relates to immunisation. In addition, a nationally consistent approach will only be effective through national accreditation of immunisation education programs. This would ensure monitoring of a nationally consistent approach. For registered nurses and midwives this would be undertaken by the Australian Nursing and Midwifery Accreditation Council (ANMAC).

The ANMF proposes ANMAC is the ideal entity to undertake accreditation of immunisation programs as they have experience and a proven track record in national accreditation processes for nurses and midwives. ANMAC can perform this role as a separate entity from the National Registration and Accreditation Scheme (NRAS). The approach of ANMAC undertaking the accreditation of all immunisation programs nationally ensures the National Immunisation Education Framework for Health Professionals is actually utilised. That is, it becomes a requirement for all immunisation education providers to apply the Framework to their program, as opposed to using it just 'as a resource' (page 4).

The ANMF considers the draft National Immunisation Education Framework for Health Professionals provides a foundation for national consistency. However, there is clearly much work to be done to improve the context of immunisation provision in this country. Clarity in immunisation practices and education requirements is not only in the best interests of immunisers, it is vital for the safe and competent delivery of immunisation programs by registered nurses and midwives, for the benefit of the community.

To summarise, the ANMF recommends there be:

- harmonisation of State and Territory drugs and poisons legislation as it relates to immunisation,



- agreement by all jurisdictions on national consistency on immunisation education, legislation, practices and authorisation, and
- national accreditation of immunisation education programs for registered nurses and midwives by the Australian Nursing and Midwifery Accreditation Council.

**‘Training programs’, page 3:**

This section refers to immunisation programs being offered to enrolled nurses. Under the heading ‘Implications’ it is stated that ‘background research...supported an approach that “provided clear direction about the core areas of knowledge and skills to enable operation as an independent immunisation provider”(emphasis added). Reference is made in other sections of the draft document to ‘health professionals eligible to practice independently within their state or territory...’ - for example, page 3 under ‘The National Framework for Immunisation Education for Health Professionals’.

Nursing and midwifery regulation requires that enrolled nurses work under the direct or indirect supervision of the registered nurse or midwife. Practising within this regulatory framework, the enrolled nurse can not act as an independent immunisation provider. In order to protect the regulated scope of practice of the enrolled nurse, the ANMF contends the role of independent immunisation provider, therefore, is that of the registered nurse and midwife.

**‘Education provider standards’, pages 3 and 4:**

The ANMF agrees with the statement under the ‘Education’ heading which reads ‘Education providers delivering immunisation courses leading to independent practice as an immunisation provider are required to be either an accredited higher education provider or affiliated with an accredited higher education provider or a Registered Training Organisation.’ The importance to safe and competent delivery of immunisation programs to the community warrants this level of education provider standard.

**‘Maintaining authorisation’, page 4:**

The ANMF supports the requirement for immunisers to show evidence of on-going professional development relevant to the area of their practice. For registered nurse and midwife immunisers this is already within their requirement under the NMBA Continuing professional development registration standard.



The Domains, Standards for practice and Learning objectives, pages 5-20

There is concern from ANMF State and Territory Branches and members who are nurse and midwife immunisers, that the draft National Immunisation Education Framework for Health Professionals (National Framework) is less robust, prescriptive and detailed in content than the existing National Guidelines for Immunisation Education for Registered Nurses and Midwives (National Guidelines). In addition, whereas the existing Guidelines specified the immunisers to whom they applied - registered nurses and midwives, the Framework applies to an undefined immunisation workforce.

Our concern is thus, that the current relatively robust arrangements for registered nurse and midwife immunisers may be undermined in an environment of reduced specificity.

Acting on our proposal for ANMAC to be the national accreditation body for immunisation education programs for registered nurses and midwives, would give assurance of education program standards nationally agreed to by the nursing and midwifery professions, as occurs with all other education programs for our professions.

It is noted (page 5) that the 'National Framework' ... provides the minimum curriculum for immunisation education to support consistency in quality and effective immunisation programs in Australia.' Currently, registered nurses and midwives have a recognised level of educational preparation prior to undertaking an immunisation education program, which includes for example, management of medicines for administration; assessment of a person's health status; and recognition of, and safe management of, adverse reactions to medicines – such as anaphylaxis. Beyond stating that the National Framework is 'appropriate to health professionals eligible to practice independently with in their state or territory...' the Framework does not identify prerequisite knowledge and qualification requirements for those intending to undertake the immunisation program.

As stated previously, the draft National Framework appears significantly less prescriptive and detailed than the existing National Guidelines.

For example:



- the term 'learning objectives' is used in place of the 'recommended content' for this topic which is currently part of the National Guidelines. This lack of detail may reduce the robustness and quality of the program of study which underpins authorisation to practice as a nurse or midwife immuniser. The ANMF recommends the 'recommended content' should be carried over into the new draft National Framework to ensure the programs of study are robust.
- Section 1.1 of the draft National Framework states a need to 'Explain why we need to continue to vaccinate even when diseases are no longer a problem in Australia.' We consider this sentence should be deleted as it is not true to say diseases are no longer a problem in Australia. Research indicates that Flu remains a significant cause of ill health and death - and is a reason for hospital admissions (through secondary conditions arising from the flu). Also, there is an increase in the incidence of diseases previously controlled through immunisation programs, with Whooping Cough being a prime example.
- Section 4.3 of the draft National Framework is also significantly less detailed than '2.2 Recognition and Management of Adverse Events' contained on page 18 of the existing National Guidelines. The draft National Framework now only requires the health professional to identify and discuss the management of adverse events post-immunisation, as compared with recognition and management of adverse events, in the National Guidelines. To ensure public safety it is critical that any health professional who is authorised to administer vaccinations is also educationally prepared to competently manage adverse events such as anaphylaxis. The detailed content should remain a stipulated component of the National Framework.
- Topic 4.6 of the draft National Guidelines is a significantly watered down version of the equivalent 1.4 of the existing National Guidelines which deals comprehensively with immunisation refusal. This should remain a critical element of the immunisation education program so that nurse and midwife immunisers can effectively engage and increase immunisation rates.



The ANMF requests a further Standard for Practice be included as follows:

#### **4.7 Managing Outreach and Mass Vaccination Clinics**

**Standard for Practice** Demonstrates knowledge of the requirements for managing outreach and mass vaccination clinics.

The recommended content (currently titled 'Learning objectives') would then be framed around:

- venue planning
- operational management and staffing
- collaborative decision making with other government sectors
- working with the public en masse
- demonstrating understanding of, and respect for, cultural issues relating to outreach immunisation programs in Aboriginal and Torres Strait Islander communities. This includes wherever possible employing Aboriginal or Torres Strait Islander nurse and midwife immunisers, and collaborating with Aboriginal and Torres Strait Islander health workers from the local community.

#### **Conclusion**

In concluding, the ANMF stresses that it will be imperative for there to be retention of recognition of the qualification attainment of all existing registered nurse and midwife immunisers, following a change from the National Guidelines to the National Framework, which will be the underpinning document for immunisation education programs.