



# NEW SOUTH WALES NURSES' ASSOCIATION

In association with the Australian Nursing Federation

BH: ABU

Ms Bronwyn Nardi  
Chair  
Practitioner Regulation Subcommittee  
Health Workforce Principal Committee

19 December 2008

Dear Ms Nardi,

## **Submission on Proposed Arrangements for Other Matters for Inclusion in Bill B for the National Registration and Accreditation Scheme for Health Professionals**

Thank you for the opportunity to comment on the proposed registration arrangements for the National Registration and Accreditation Scheme for Health Professionals. The New South Wales Nurses' Association (NSWNA) is the industrial and professional body that represents over 51,000 nurses in New South Wales. The membership of the NSWNA comprises all those who perform nursing work, from assistants in nursing, who are unregulated, to enrolled and registered nurses at all levels including management and education.

NSWNA works in association with the Australian Nursing Federation (ANF) on national matters and as such supports the ANF's submission, developed in consultation with all ANF Branches, to the Practitioner Regulation Subcommittee.

In response to feedback from our membership, NSWNA's submission develops the ANF position to reflect the views and perspectives of nurses and midwives working in NSW.

Please find NSWNA's submission attached and do not hesitate to contact me at this office if you have any queries regarding the submission.

Yours sincerely

**BRETT HOLMES**  
General Secretary

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NSWNA submission on

*Other Matters for Inclusion in Bill B*

*for the National Registration and Accreditation Scheme for Health Professionals*

**GENERAL COMMENTS**

The principles in general are supported by NSWNA.

**2. STATUTORY FUNCTIONS OF NATIONAL BOARDS, NATIONAL AGENCY AND AUSTRALIAN HEALTH WORKFORCE ADVISORY COUNCIL**

Supported

**3. DELEGATION POWERS OF NATIONAL BOARDS**

**Types of Committees**

Supported

**Key decisions**

Supported with the following amendments:

*Complaints handling and performance, health and conduct management functions:*

- *Decision to immediately suspend **or impose conditions on a** registration in response to ~~possible risk to~~ **a serious potential risk or further risk** to public health and safety*

*Course approval function:*

- *Decision to approve a course of study for registration purposes*
- ***Decision to approve a course of study contingent on identified changes being made***
- *Decision to refuse to approve a course of study for registration purposes*

**More flexible committee arrangements**

***Proposal 3.5.1***

Supported

***Proposal 3.5.2***

Supported

***Proposal 3.5.3***

Supported in principle – however, as currently proposed the legislation would permit a situation where a panel may comprise an even number of members; this would not allow



adequate or appropriate functioning of the panel. This section therefore must provide for an **odd** number of panel members, NSWNA would recommend three as optimal, with no more than **two thirds** of the members being registrants from the profession concerned.

**Proposal 3.5.4**

Supported

**Proposal 3.5.5**

Supported

**Further safeguards around delegations**

**Proposal 3.6.1**

Supported

**4. APPOINTMENTS TO BOARD (NON-STATUTORY) COMMITTEES OR (STATUTORY) PANELS**

**Proposal 4.1.1**

Supported

**Proposal 4.1.2**

Option 1 is supported with the following amendment:

*The legislation empowers boards to appoint persons to such committees in accordance with a process approved by the Ministerial Council. The Ministerial Council process requires:*

- *an open and transparent process where nominations are sought publicly from individuals and professional bodies*
- *minimum membership requirements for any committee delegated decision making, to ensure a balance of registrant and non-registrant members, and*
- *appointments for periods of up to three years, **with the option of re-appointment if required.***

**Proposal 4.1.3**

Option 1 is supported

**5. INTERACTION OF NATIONAL SCHEME WITH OTHER LEGISLATIVE SCHEMES**

Principles are supported

**Proposal 5.2.1**

Supported



**Proposal 5.2.2**

Supported

**Proposal 5.2.3**

Supported

**Proposal 5.2.4**

Supported

**Proposal 5.2.5**

Supported

**Proposal 5.2.6**

Supported

**Proposal 5.2.7**

Supported

**Proposal 5.2.8**

Supported

**Proposal 5.2.9**

Supported

**Proposal 5.2.10**

Not supported – given that in many circumstances *special events* as described will be related to matters where health professionals require temporary registration, the national legislation for the scheme should apply.

**6. TRANS-TASMAN MUTUAL RECOGNITION AND THE NATIONAL SCHEME****Proposal 6.1**

Supported

