



# 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

17 December 2008

Dear Ms Nardi,

## **Submission on Proposed Arrangements for Accreditation 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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*Proposed Arrangements for Accreditation*

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

## GENERAL COMMENTS

The nursing and midwifery professions, through the Australian Nursing and Midwifery Council (ANMC) have already developed a national framework for the accreditation of courses leading to registration, enrolment, endorsement and authorisation in Australia. The framework, which establishes the processes for the accreditation of courses and the principles underpinning these processes, was completed in 2007. In a related project, ANMC is currently developing the national standards and criteria for these courses. This project is due for completion in early 2009. The accreditation framework is available at:

[http://www.anmc.org.au/professional\\_standards/index.php](http://www.anmc.org.au/professional_standards/index.php). The framework will be updated in line with the National Accreditation process.

This framework has been developed through extensive consultation with the professions, which have agreed that it provides appropriate guidance for education providers and accreditation bodies in developing courses for nursing and midwifery which meet national standards and the expectations of both nurses and midwives and consumers of their care.

This framework, rather than international or other professional models, is therefore the appropriate mechanism to guide accreditation processes for nursing and midwifery.

The size of the nursing and midwifery professions and the number of courses that are currently required to ensure competent practice and the protection of public safety by the professions are significant. The consultation paper does not adequately address how the volume of work related to accreditation generated by the needs of the professions will be achieved by the processes it has outlined. This must be addressed.

While the consultation paper proposes that principles for and conduct of assessment of overseas educated health professional will be the responsibility of the accreditation body, it does not adequately address how the volume of work related to assessment of overseas educated nurses and midwives will be achieved. As with domestic courses for nursing and midwifery, the workload involved and the knowledge and skills required to conduct these assessments appropriately is significant.

It is critical that particular consideration is given to developing and implementing structures and processes for accreditation for nursing and midwifery which will have the capacity to achieve the work that is involved while maintaining professional standards and ensuring national consistency.



## 1.6 PRINCIPLES

Supported

## 3. PROPOSED NEW ACCREDITATION ARRANGEMENTS

### Key Features of Proposed System

While NSWNA is generally supportive of the key features of the proposed system of accreditation for the scheme, we have some concerns regarding the governance arrangements for any new external body assigned the accreditation functions of the national board. Contracts negotiated between the agency/board and the body assigned accreditation functions as part of the health profession agreement must be transparent with the specific roles and functions of the committee determined by the national board. These arrangements must be structured such that the integrity of the body responsible for the accreditation of courses for nursing and midwifery is preserved and operates within the standards expected by the professions. This will be best achieved by the establishing committees (however titled) of the national board to undertake accreditation functions rather than an external body or agency.

NSWNA also has some concern regarding the proposed arrangements for resourcing the costs of accreditation; the proposals for meeting these costs outlined in the consultation paper are unclear, particularly with regard to proposed mechanisms for 'cost recovery'. While we appreciate that there would be some circumstances where charges to individuals for examinations would be appropriate, e.g. overseas qualified nurses and midwives, the guidelines for the purpose and conduct of any such examinations need to be completely transparent. Arrangements for examinations must be structured so that there is no possibility for the agency or national board or any of its committees responsible for accreditation to conduct unnecessary examinations due to financial pressures.

### Roles in Relation to Accreditation

NSWNA has some concerns regarding the proposed role of the Australian Health Workforce Advisory Council with respect to accreditation. As we have discussed in our previous submissions on proposed arrangements for the scheme, NSWNA does not support any situation which could permit perceived workforce need, exemplified as shortages, to override professional standards and risk compromises to patient safety.

NSWNA generally supports the proposed responsibilities of accreditation bodies under the scheme. However, it is questionable how these functions, for example point (e), will be fully achieved under the structures currently proposed. The sheer volume of work, and the knowledge and skills required to conduct this work effectively, involved in the accreditation of courses for nursing and midwifery simply will not be achieved by a single accreditation body. Proposals which outline how this work will be achieved have not been made clear in the consultation paper.

### Scope of Accreditation



While we support, in principle, the proposals outlined in this section, as above, we refer to the volume of work and the specific expertise that is required to achieve appropriate accreditation of courses for nursing and midwifery so that professional standards, in which consumers may have confidence, are maintained. This will not be achieved under the proposed arrangements for accreditation for the scheme. NSWNA therefore recommends the continuation, or replication, of state and territory based structures (such as those that currently exist in within Nurse & Midwife Regulatory Authorities (NMRAs)) within the proposed offices for the scheme, and, most particularly, retention of the expertise of staff currently employed for these roles.

### **Recognition of specialties and accreditation of specialist training**

#### ***Proposal 3.4.1***

Supported

#### ***Proposal 3.4.2***

No comment

#### ***Proposal 3.4.3***

Supported

### **Core accreditation functions**

#### ***Proposal 3.4.4***

Supported

#### ***Proposal 3.4.5***

Supported

#### ***Proposal 3.4.6***

Supported

### **Additional functions relating to the national scheme**

#### ***Proposal 3.4.7***

Supported

### **Governance Arrangements for External Accreditation Bodies**

#### ***Proposal 3.5.1***

Supported

#### ***Proposal 3.5.2***



Supported

***Proposal 3.5.3***

Supported

***Proposal 3.5.4***

Supported

***Proposal 3.5.5***

Supported

***Proposal 3.5.6***

Supported

***Proposal 3.5.7***

Supported

***Proposal 3.5.8***

Supported

**Accreditation Committees**

***Proposals 3.6.1 – 3.6.3***

NSWNA supports the establishment of committees (however titled) by national boards, with members of these committees appointed by the national boards, to undertake the functions of accreditation for the nursing and midwifery professions. Separate committees will be required for nursing and midwifery.

The national board must ensure that the membership of any such committees comprises adequate representation from the professions. This must include:

- practising clinicians;
- nurses and midwives involved and experienced in education from both the university and VET sectors;
- an Aboriginal and Torres Strait Islander nurse and midwife;
- appropriate representation from key professional/industry stakeholders;
- appropriate consumer representation; and,
- board members.

However, we reiterate that consideration must be given to how these committees will ultimately be structured and resourced so that they are enabled to achieve the entirety of their functions.



## Administration

### **Proposal 3.6.4**

As discussed above, because of the volume of work involved in accreditation for nursing and midwifery it is unlikely that the proposed arrangements for accreditation for the scheme will allow all of the accreditation functions and responsibilities for nursing and midwifery to be achieved.

NSWNA therefore not only recommends ensuring that adequate administrative support for these functions is made available through the national agency but also the continuation, or replication, of state and territory based structures (such as those that currently exist in within NMRAs) within the proposed offices for the scheme.

Significantly this will require retention of the expertise of staff currently employed in NMRAs for these roles.

## Linkages

### **Proposal 3.7.1**

Supported – however, *the education provider may request a review only on the basis of an alleged failure of the accreditation committee to follow appropriate processes or to meet specified standards for decision-making and reporting (including basing decisions on accurate and relevant evidence). Requests for review must be addressed to the NMRA and must be dealt with expeditiously* (ANMC 2007 Accreditation Framework, p.18). The grounds of the appeal and the place of the appeal, that is who will conduct this process, must be completely clear.

## Indemnity

### **Proposal 3.8.1**

Supported

## Funding arrangements

The scheme must ensure that the national nursing and midwifery board has access to and control over sufficient and suitable financial and human resources to allow it to conduct all of its functions fully. Any cross subsidy between the health professions and their boards which disadvantages the professions of nursing and midwifery or any nurse or midwife will not be supported.

## Accreditation processes

### **Proposal 3.10.1**

The components of the proposal outlined in this section are unclear. While NSWNA recognises and appreciates the need for Australian standards to meet international best practice standards, national standards need to be developed for the national context first while



considering a range of issues, including degree structures, funding arrangements, models of determining competence, together with international standards of practice. National standards must not be determined wholly by international trends, especially where the models of competence, degree structures and funding arrangements are not comparable.

The introduction of the terminology 'panels' in this section is particularly unclear; the proposed purpose, roles and functions of these panels need to be much more clearly defined and explained before any appropriate comment can be made.

***Proposal 3.10.2***

Supported – this proposal should also include the requirement for education providers to submit significant changes to any of their accredited programs to the appropriate accreditation body for assessment and approval of those changes.

**4. LINKAGES WITH COMMONWEALTH, STATE AND TERRITORY GOVERNMENT BODIES**

***Proposal 4.1***

Supported

**5. INTERNATIONAL LINKAGES**

***Proposal 5.1***

Supported

**6. TRANSITIONAL ARRANGEMENTS**

Supported – however, in circumstances where courses are currently accredited for a determined period of time, they should be allowed to complete their full term before being obliged to apply for reaccreditation under new national standards.