



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

11 February 2009

Dear Ms Nardi,

Submission on Proposed Arrangements for Specialists 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

Proposed arrangements for specialists

within the National Registration and Accreditation Scheme for Health Professionals

GENERAL COMMENTS

NSWNA 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 NSWNA; these specific concerns are outlined below.

SPECIALIST ENDORSEMENT

Registration arrangements consultation paper – Proposal 10.1.1

Supported

Registration arrangements consultation paper – Proposal 12.1

Supported

Accreditation arrangements consultation paper – Proposal 3.4.3

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

NSWNA supports the principle of open and transparent consultation with relevant stakeholders regarding developments in practice and professional and accreditation standards. However, NSWNA 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. Without appropriate management, this proposal could provide an avenue for professional demarcations and ‘turf wars’ to block advances in practice by health professions irrespective of the benefit these advances and developments may bring to the practice of professionals in the delivery of health care and therefore the community.

CONTINUING COMPETENCE AND/OR CONTINUING PROFESSIONAL DEVELOPMENT REQUIREMENTS

Registration arrangements consultation paper – Proposals 9.2.1 & 9.2.2



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

However, we have some concerns regarding the proposed requirements for both general and specialist registrants to demonstrate competence at the time of annual renewal of registration. This is because there is a lack of consistency in current approaches by regulatory authorities to assessment of continuing competence and an uncertainty that these assessments are able to provide genuine and accurate assessments of continuing competence.

While we appreciate that a significant amount of work regarding continuing competence in nursing and midwifery has been undertaken across the country, we consider that many of the mechanisms currently in place or being proposed would not provide accurate demonstrations of continuing competence by nurses and midwives. This is not only because many of the systems in place in other jurisdictions would not be able to cope with the size of the nursing and midwifery workforce in NSW but also because there is currently too great a reliance on mechanisms which permit subjectivity, bias and inequity for nurses and midwives in terms of access and costs.

NSWNA therefore recommends that only requirements which can genuinely assess and demonstrate continuing competence should be included in the scheme. 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 their goals would be unacceptable.

REGISTRATION OF SPECIALISTS (Including area of need specialists)

Registration arrangements consultation paper – Proposals 7.1 & 7.2

NSWNA supports the general restructure of this proposal but we do not support limited registration for either 'specialist practice' or 'area of need'. In fact 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. Without appropriate attention and control from the national board, these two sections risk a situation where people with inappropriate qualifications could be given 'limited registration' as a nurse or midwife. For example the wording "to practise independently in a specialty" suggests that in certain circumstances a person could be registered as a pseudo nurse practitioner.

If people 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 exactly the same concerns now for NSWNA as it did in the initial proposal. Our position is therefore unchanged, particularly given the budgetary environment in NSW and the imperatives announced by the NSW Government to cut costs including the introduction of unregulated workers. Providing for individuals or groups of people



to gain registration without appropriate qualifications, experience or competence to meet workforce needs and/or provide 'fillers' for areas of shortage is not supported by NSWNA. Rather it is considered as a potentially dangerous strategy. This point should be removed.

SCOPE OF PRACTICE

Registration arrangements consultation paper – Proposal 10.3.1

As stated above with reference to Proposal 3.4.3, NSWNA supports the principle of open and transparent consultation with relevant stakeholders regarding developments in practice and professional and accreditation standards. However, NSWNA 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. Without appropriate management, this proposal could provide an avenue for professional demarcations and 'turf wars' to block advances in practice by health professions irrespective of the benefit these advances and developments may bring to the practice of professionals in the delivery of health care and therefore the community.