

13 February 2009

Ms Bronwyn Nardi
Chair
Practitioner Regulation Subcommittee
of the Health Workforce Principal Committee
Email: nraip@dhs.vic.gov.au

Attention: Practitioner Regulation Subcommittee

Dear Ms Nardi

Re: Submission to Further Consultation Paper Proposed arrangements for specialists within the National Registration and Accreditation Scheme for the Health Professions

The Nurses Board of Victoria (NBV) is pleased to provide a response to the above paper. The NBV supports many of the proposals contained in the consultation paper. Where we do not support the proposal we have provided additional information. In reviewing this in line with the other consultation papers I feel it is important to comment on the proposed legislated requirements for the national boards to seek approval from the Ministerial Council for standards, codes, guidelines and specialists. The concern relates to the volume of approvals that will potentially be required that will result in unnecessary delays for any changes the national boards may make in the future, and the impact this will have for the professions in practice.

Thank you again for the opportunity to comment.

Yours faithfully



Nigel Fidgeon
Chief Executive Officer
Nurses Board of Victoria



NBV

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NBV response to the 'Proposed arrangements for specialists within the National Registration and Accreditation Scheme for the Health Professions' consultation paper.

Item no	NBV response
Proposal 10.1.1 Registration arrangements consultation paper	<p>The NBV <u>supports</u> the amendment to read 'qualification standards' with the understanding that the boards have the power to develop the standards for professional endorsement.</p> <p>The NBV <u>does not support</u> the addition of the following:</p> <p>'It is further proposed that the Ministerial Council may issue guidance to boards in relation to criteria for the recognition of specialties, including those specialties to apply from 1 July 2010.' It is the view of the NBV that the criteria should be developed by the boards and not the ministerial council.</p>
Proposal 12.1 Registration arrangements consultation paper	<p>The NBV <u>supports</u> the amendment to the proposal, however suggests changing the term "multiple registrations" to " if a practitioner is registered in more than one jurisdiction" as the term "multiple registrations" applies to a nurse that is registered in more than one division on the register.</p> <p>NBV further suggests not using the word "deemed" as a deemed registration implies that substantive registration would need to be sought after the case.</p>
Proposal 3.4.3 Accreditation arrangements consultation paper	<p>The NBV is of the view that the approval of new specialties should be determined by the national boards.</p> <p>The NBV <u>agrees</u> with the proposal that the national boards determine how current registration status should translate to registration under the new scheme.</p> <p>The NBV <u>supports</u> consultation with other board and stakeholders on new endorsements and changes to scope of practice but does not support this proposal being legislated. The NBV is of the view that broad consultation is an inherent part of best practice.</p>
Proposal 9.2.1 Registration consultation paper	<p>The NBV <u>supports</u> this addition to the proposal.</p>
Proposal 9.2.2 Registration consultation paper	<p>The NBV <u>supports</u> the additions to this proposal.</p>
Proposal 7.1 Registration arrangements consultation paper	<p>The NBV <u>supports</u> the proposal for general and provisional registration. The NBV <u>recommends</u> that the title 'specific registration' used in preference to 'limited registration' as the term 'limited' carries connotations of professional misconduct for the registrant and may lead to confusion.</p>



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Further comment:

Page 2, 'Specialist endorsement', dot point B:

NBV suggest removing the word "initial" registration as nurses applying for specialist qualification will already be on the register and therefore this would not apply.