

5 February 2019

Standards review
Australian Nursing and Midwifery Accreditation Council
GPO Box 400
Canberra ACT 2601.

To whom it may concern

Re: Review of Registered Nurse Accreditation Standards - Consultation 3

Thank you for the opportunity to be part of the third consultation round for the Review of the Registered Nurse Accreditation Standards.

We see a number of positive aspects to the new standards, in particular:

- The proposed new Standards are much less prescriptive than the outgoing Standards, enabling education providers to be more creative and ‘think outside the square’ in relation to preparing the new generation of Registered Nurses;
- The proposed new Standards consist of only 6 standards, rather than the 9 standards that comprise the outgoing Standards, with associated ‘stream-lining’. Moreover, these 6 standards are largely course-focussed, reducing duplication with the areas that other regulatory bodies (e.g. TEQSA) oversee.
- The proposed new Standards have tightened the rules for workplace learning undertaken outside of Australia; and
- The proposed new Standards clearly link both ‘supervision’ and ‘assessment of competence’ in the industry setting to the Registered Nurse, rather than a ‘health professional’.

We also see a number of areas of concern, including:

- There is no longer a standard related to the nursing philosophy to guide the program. This is a retrograde step for the profession of nursing and the education of Registered Nurses in the tertiary sector. Philosophical positioning must be surely be viewed as essential to unifying a curriculum and shaping the worldview of nursing students. .
- The proposed Standard 1.5 states: “*The education provider undertakes screening and management of students who present with an impairment and reports to the NMBA as required*”. This potential Standard would present particular challenges to education providers and requires more information – e.g. if a student ‘presents’ with an impairment, who will undertake the screening and assessment? What will be the rules around this screening and assessment? The wording would be better changed to: “1.5: *The education provider support students who present with an impairment, in accordance with relevant legislation, and notifies the NMBA as required.*”

- The proposed Standard 3.7 states “*Program content and subject learning outcomes prepares students to supply under a structured prescribing arrangement.*” We are uncertain of the meaning of the word ‘supply’ in this sentence. This word requires further clarification please.

Thank you again for this opportunity to respond.

Kind regards,



Professor Catherine Hungerford, RN, PhD, FACMHN
Head, School of Nursing, Midwifery and Indigenous Health
Charles Sturt University
Boorooma St
Wagga Wagga, NSW, 2650
Australia
Tel: +61 2 693 34110
Email: chungerford@csu.edu.au