



australian
nursing federation

7 July 2008

Ms Karen Cook
Chief Executive Officer
Australian Nursing and Midwifery Council
PO Box 873
DICKSON ACT 2602

Dear Karen

Re: ANMC National Continuing Competence Framework (Draft 3)

Thank you for your invitation to consider and offer feedback on draft 3 of the National Continuing Competence Framework. The Australian Nursing Federation (ANF) remains strongly opposed to the stipulated minimum practice hours and minimum continuing professional development hours requirements of the framework.

As has been previously stated, the ANF strongly supports nurses and midwives' self assessment of competence, demonstration of current practice and participation in voluntary continuing professional development activities.

Self-declaration of competence to practice following this process is and remains the most appropriate mechanism by which nurses and midwives, as educated and qualified health professionals, should renew their registration to practice. There has been no demonstration of sound evidence that the introduction of this mandatory framework would assure competence to practice.

The ANF would again propose that the National Continuing Competence Framework should require evidence of currency of practice, evidence of relevant continuing professional development, a choice of assessment against the national competency standards (self-assessment or professional review) and a self-declaration of competence to practice.

The ANF remains opposed to the linking of mandatory minimum continuing professional development hours (CPD) and minimum practice hours to ongoing registration. The consequences of the requirements for mandatory minimum CPD and practice hours may be that nurses and midwives elect not to renew their registration despite their competence to do so.

The ANF's response to the National Continuing Competence Framework (Draft 3) has been addressed using the feedback questionnaire provided by ANMC which accompanies this letter.

Should you have any questions in relation to the feedback provided please contact me on (03) 9602 8504 or via email at ged@anf.org.au.

Yours sincerely



Gerardine (Ged) Kearney
Federal Secretary

Encl.

The industrial and professional organisation for nurses and midwives in Australia

Canberra Office (Professional Services)

Unit 3, 28 Eyre Street Kingston ACT 2604
Australia
PO Box 4239 Kingston ACT 2604 Australia
+ 61 2 6232 6533 (T) + 61 2 6232 6610 (F)
anfcanberra@anf.org.au

Melbourne Office (Industrial Services)

Level 1 / 365 Queen Street Melbourne VIC 3000
Australia
+ 61 3 9602 8500 (T)
+ 61 3 9602 8567 (F)
industrial@anf.org.au
anfmelbourne@anf.org.au

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