



Accreditation Project Consultation Questionnaire

July 2008

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Organisation Represented Australian Nursing Federation, Federal Office

Date Sent to ANMC: 9 September 2008

[Date Received ANMC]:

Please indicate which profession-specific document you are providing feedback on (please complete a **separate questionnaire** for each document **if you are responding to more than one**):

Registered Nurses

Nurse Practitioners

Midwives

Enrolled Nurses

Questionnaire

1. Is the overall format of the Standards and Criteria clear and easy to understand? Please comment

Yes.

2. Are the Standard statements clear and easy to understand? Please comment.

Yes

3. Are the Statements of Intent clear and easy to understand? Please comment.

Yes

4. Are the Criteria clear and easy to understand? Please comment.

Yes, although there is overlap/duplication in one criteria in Standard One and Standard Eight.

5. Are the criteria congruent with the standard statements and the statements of intent? Please comment?

Yes

6. Is the Explanation of Terms clear and easy to understand? Please comment.

Yes, in the most part.

As this section is at the end of the document, it would be helpful for terms to be referenced to the explanation of terms when they first arise in the document so that it can be used as a progressive reference.

The term professional experience placement is confusing given most people would use the terminology "clinical placement". See question 8 for further discussion.

Competence – the term decision making framework should be used before using the DMF acronym.

Consumer – the last word of the final sentence should be changed from ‘personnel’ to ‘professionals’.

Cultural security – the last sentence of the first paragraph should read ‘...that no one person is afforded a less favourable outcome because of the cultural outlook they hold.’ This change is suggested to avoid locating one cultural outlook as ‘different’ or ‘the other’.

Education provider – should remove reference to ‘a recognised training organisation (RTO)’ for these Standards as RTO’s do not prepare undergraduate students to be midwives.

Procedural fairness – dot point 2 – should be amended to ‘...a fair opportunity to prepare for, and answer ...’

Supervision/support – delete ‘for instance’.

7. Are there any terms missing from the Explanation of Terms?

No

8. Other general comments, if any:

The Draft National Accreditation Standards and Criteria for Midwives are well presented and organised. They provide clear indicators for determining whether pre-registration midwifery courses will fulfil the defined requirements to prepare graduates for entry to practice and fit logically within the ANMC’s national framework.

The ANF does have concerns regarding the use of the term “professional experience” in Standards Four and Eight. Whilst it is appreciated that this term may be intended to include the breadth of professional domains of midwifery and therefore the professional experiences that students may have in the course of their studies, use of this term and the related standards are not sufficiently clear in articulating the requirements for **actual clinical experience**.

Professional experience must not replace or be offered in lieu of any clinical learning which is required for midwifery students to achieve the graduate competency outcomes.

The Standards should clearly articulate the need for course providers to demonstrate how midwifery students will be provided with sufficient and appropriate clinical experience opportunities to achieve the graduate competency outcomes required for effective and safe beginning practice.

Feedback Template

Please use this table to provide any comments on specific aspects of the document to which you are responding.

	Suggested Changes to Standard Statement	Suggested Changes to Statement of Intent	Suggested Changes to Criteria (please indicate by number)	General Comments
Standard 1			<p>3. This point should require education providers to demonstrate <i>their processes for</i> course development, monitoring, review, evaluation, and quality improvement.</p> <p>6. Should detail that the students have these facilities and resources 'provided' and that they would not be expected to fund or subsidise the opportunity to participate in clinical placements.</p> <p>7. It is unclear what is meant by 'requirements' in this point, or whether the 'requirements' are related to the 'formal agreements' – the intention here needs to be articulated more clearly.</p> <p>9. The requirements of regulatory authorities for approval of credit transfer and RPL should be more explicit, including the requirement for course providers to provide evidence of their policies regarding RPL.</p>	<p>Some health services are charging providers for clinical placement. These costs should not be passed on to the student by the providers as additional fees or charges.</p>

			There should also be an additional requirement for course providers to demonstrate that their staff are, as well as how they are, provided with sufficient and appropriate supports and resources to deliver the course fully, i.e. to enable students to meet graduate outcomes.	
Standard 2		Should read 'That staff are appropriately qualified ...'	Staff also need to be able to demonstrate recency and currency of theoretical and clinical knowledge and practice. This needs to be required explicitly in the criteria. 4. Should require 'registration' not 'practising certificate'. 5. After the word 'qualification' remove 'and are not' and replace with 'do not include...'	
Standard 3			Criteria 10 from Standard 3 of the RN Standards should be included – 'Assistance for students to determine whether the course of study and the mode of delivery are suited to their learning styles.' 2. 'registration to practice' should be 'registration to practise'.	

<p>Standard 4</p>	<p>Professional experience – see general comments.</p>		<p>2. This is not a pre-registration course. Delete the word 'pre-registration' and leave 'midwifery course'. Change '18 months' to '12 months' and '78 weeks' to '52 weeks'.</p> <p>6. The first, or any, clinical placement in an pre-registration midwifery course should occur as soon as is educationally appropriate <i>not as early as practicable</i> – this should be achieved with a realistic period of clinical experience in the first year but only when the student has been appropriately prepared to undertake placement safely.</p>	
<p>Standard 5</p>			<p>Suggest an additional criteria be added (similar to Standard 5 criteria 4 dot point 2 professional knowledge and skills) which addresses '...professional, legal and ethical responsibilities of midwifery practice; an understanding of regulation and health policy issues as they relate to midwifery practice...'. Without this, the Standard is somewhat disjointed in referring to cultural safety, mental health and pharmacology, but not a wider context of professional, legal and ethical practice.</p>	

Standard 6				
Standard 7			5. It is not sufficient to state only 'quality' of assessors etc. Course providers must demonstrate that assessors are both appropriately qualified and experienced so that they may be able to undertake quality assessments.	This section could include some reference to the use of student feedback regarding the curriculum and assessment by the course provider to review course content.
Standard 8	Professional experience – see general comments.		1. Delete the word 'any' and replace with 'all'. 2. Delete the word 'any' and replace with 'all'. 8. After the word 'community' add 'midwifery'.	
Standard 9	Delete the word 'midwifery' before graduates as the document infers this meaning.	Delete the word 'midwifery' before students as the document infers this meaning.	Criteria should be the same as for the RN Standards with the words nursing amended to midwifery.	

Thank you for your valuable feedback.