



12 August 2008

Ms Petrina Halloran
Acting Chief Executive Officer
Nurses Board of Victoria
GPO Box 4932
MELBOURNE VIC 3000

Dear Ms Halloran

Re: Australian Nursing Federation submission to the Nurses Board of Victoria Discussion Paper: Bachelor of Nursing courses leading to division 1 registration

Thank you for the opportunity to provide a submission in relation to the Nurses Board of Victoria (NBV) Discussion Paper: Bachelor of Nursing courses leading to division 1 registration.

Please find enclosed the Australian Nursing Federation's (ANF) response to the feedback questions. Also attached are the Australian Nursing and Midwifery Council Position Statement on Registered Nurse and Midwife Education and the Council of Deans of Nursing and Midwifery's Position statement on Bachelor of Nursing Degrees in TAFE referred to in the ANF response.

If you have any questions in relation to the documents provided please contact Julianne Bryce, Federal Professional Officer on (03) 9602 8520 or julianne@anf.org.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Gerardine", with a stylized flourish at the end.

GERARDINE KEARNEY
Federal Secretary

Encl.

The industrial and professional organisation for nurses and midwives in Australia

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Nurses Board of Victoria

Discussion Paper July 2008

Bachelor of Nursing courses in Higher Education Institutions

Feedback Questions

Please tell us, providing well supported reasons:

- 1. If the type of educational institution (ie: university or other higher education providers) providing a course leading to registration as a division 1 nurse results in any differences in the level of education and competence that can be expected of a registered nurse graduating from that institution.**

The Australian Nursing Federation (ANF) is concerned there is a risk of lowering professional education standards if nursing is offered in the Vocational Education and Training (VET) sector. Nursing is a complex and demanding profession that requires rigorous scholarly preparation based on evidence and research. The VET sector is not uniformly equipped to offer undergraduate Bachelor of Nursing students the level of scientific and research based education that is required of self-accrediting universities. Universities recruit qualified staff at the highest professional levels who must meet extensive requirements for research and publication to ensure that their scholarship continues to inform the teaching and learning offered. These academic staff requirements are not inherent in the VET sector as a large proportion of VET sector educators, although competent, are sessional and are employed on a casual basis with no set requirements for scholarship or research.

Students graduating from a Bachelor of Nursing offered by a VET sector provider may be unable to meet the Australian Nursing and Midwifery Council (ANMC) *National Competency Standards for the Registered Nurse*. The ANMC national competency standards indicate the need for registered nurses and midwives to be able to think critically about client care and to have the skills to contribute to the evidence-based practice framework through research and to apply research to their practice. Given the lack of capacity for research in the VET sector, there is a risk to the level of education and competence in that students undertaking registered nurse education in the VET sector may be unable to meet a range of competencies required for registration across the four domains of: professional practice; critical thinking and analysis; provision and coordination of care; and collaborative and therapeutic practice.

The current delivery of nursing education in the university sector allows the opportunity for important collaborations to occur across the health professions. Inter-disciplinary learning is widely recognised as making an important contribution to professional learning and subsequent inter-professional practice. Education for undergraduate

Bachelor of Nursing students in an environment that isolates them from other health professionals may diminish the standard of nursing education through limiting opportunities for inter-professional learning to occur, with subsequent impact on effective multidisciplinary practice.

Registered nurse education standards are also likely to be affected by an increase in demand for quality clinical placements, with competition from the VET sector affecting the ability of universities to access sufficient numbers of quality clinical placements. Underfunding of the clinical component of nursing courses or incentives and limited clinical placements has previously restricted full utilisation of available university places. Offering registered nurse education in the VET sector will place an increased burden on overstretched clinical venues to provide additional clinical placements. The ANF is concerned that many of these additional student places would not be awarded to domestic students but rather to international students who would undertake theory, utilise clinical places and when qualified, return to their country for employment.

A report produced by Universities Australia showed that 2,833 eligible applicants for the undergraduate nursing degree were not offered a place in 2008. This equates to almost 20% of nursing course applicants missing out despite nursing being identified as a national priority area in high demand. The major reason for this occurring is the limited number of clinical placements. A move to allow the VET sector to offer Bachelor of Nursing course places to international students may have the effect of further reducing available course places for domestic students. This has potential implications for the nursing workforce if the numbers of domestic graduates is reduced, and is particularly of concern at a time when there are concerted efforts to boost domestic supply through national health workforce policy. Investment in our own nursing workforce should be our highest priority in efforts to address the shortage of nurses in Australia.

2. If the type of educational institution (ie: university or other higher education providers) providing a course leading to registration as a division 1 nurse results in any differences in the continuing public confidence in the nursing profession.

Given the differences in vocational education and that offered by the university sector, there is a strong possibility that public confidence in nursing would be undermined if nursing was offered in the VET sector.

The fact that the nursing profession is engaging in a public debate in relation to this issue has the potential to undermine public confidence in undergraduate registered nurse preparation. Nationally consistent standards supported by the profession are essential to providing public confidence. This proposal does not meet nationally consistent standards as determined by the ANMC and is not supported by the peak nursing and midwifery bodies in Australia.

The Australian Nursing Federation, along with all members of the Australian Peak Nursing and Midwifery Forum, is strongly opposed to the VET sector offering Bachelor of Nursing qualifications. There are concerns that it could diminish the quality and standard of registered nurse education and ultimately be detrimental to the professional status of nursing in Australia.

- 3. If the core standards as stated in the NBV Standards for Course Accreditation achieve the aim of ensuring the integration of theory and practice to enable students to meet the ANMC National Competency Standards for the Registered Nurse – 4th Edition, January 2006. This document is available at www.anmc.org.au/publications/index.php.**

The representative body of nursing and midwifery regulators, the ANMC, states that undergraduate nursing education must be provided in the university sector.

The ANMC have endorsed a national position recognising the need for the minimum level qualification for entry to practice for registered nurses and midwives to be a university-based bachelor degree. The ANMC position statement '*Registered Nurse and Midwife Education in Australia*' recognises the right of the public to receive nursing and midwifery care of the highest professional standards and supports nationally consistent nursing and midwifery education in universities.

The views expressed in this position statement are shared by other peak nursing and midwifery bodies. They detail the importance of universities in offering undergraduate Bachelor of Nursing courses to prepare registered nurses for the high level critical thinking, problem solving and evidence based reflective practice that leads to improved health outcomes for Australians.

The ANMC is currently undertaking a project to develop national standards and criteria for the accreditation of nursing and midwifery courses leading to registration, enrolment, endorsement and authorisation in Australia in preparation for the introduction of national accreditation in 2010. The draft course standards and criteria for registered nurses stipulate that courses must be offered by a university.

The introduction to the ANMC *National Competency Standards for the Registered Nurse* states that 'Universities use the standards when developing nursing curricula, and to assess student and new graduate performance'. In particular, the domain of critical thinking and analysis and the associated competency standards within this domain could not be met by students undertaking registered nurse education in the VET sector.

In summary, the ANF has serious concerns that offering undergraduate Bachelor of Nursing course in the VET sector has the potential to undermine the educational standards of the nursing profession in Australia, threatening public confidence in the quality and safety of care provided by graduating nurses, and should not be supported.