

Submission in response to the Nursing and Midwifery Board of
Australia's papers:

- Consultation paper on registration standards and related matters
- [REDACTED]
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Submitted by the Council of Deans of Nursing and Midwifery (Australia &
New Zealand)

November 2009

General comments

Thank you for the opportunity to review the Nursing and Midwifery Board of Australia's papers:

- Consultation paper on registration standards and related matters

- [REDACTED]

Consultation paper on registration standards and related matters

On page 5, under 2.2 English Language Skills, it would seem that the English language requirement being advocated is too high if the intention is to expect this level of English on entry to a programme, rather than on completion and when it comes to Registration. Even then, one would suggest that the current rules and regulations being applied in NSW (for example) and certain other states, are more reasonable and realistic and, importantly, still protect the public. An expectation of IELTS 7 with a minimum of 7 in each band is extremely onerous and in our view unnecessary. Such a decision will lead to the death of Australia as a destination for International students of nursing. It is important to note here that this is not an issue being raised related to revenue to Universities (though it needs to be acknowledged that International students in many cases subsidise the education of domestic students and/or ensure the viability of courses) - it also grossly underrates the importance of Overseas Qualified Nurses (OQNs) and overseas students who wish to study and subsequently seek registration as a nurse in Australia and to the current and future workforce needs of the country. It does so because it is clear that over the next 5-10 years, we will need to increase nursing numbers, yet the numbers of school leavers will decrease ever more rapidly over that time.

We see no reason to expect a single test of English (eg. IELTS) to be acceptable. Presumably there are international conventions on equivalence?

If the issue of time elapsed since an English test is related to immediate application for registration AND is NOT associated with someone having undertaken a preparation programme of at least 2 years duration in Australia, then a two year rule seems reasonable. However, if someone has met entry criteria for a preparation programme in Australia that has extended over 2 years and they have been assessed as competent to practice, then our view is that they should not need to undertake further assessment in English. Should it eventuate that graduates from any given University consistently have problems with English, then that University's accreditation as a provider of pre-registration nursing programmes should be closely scrutinised, particularly in relation to RPL and English language requirements.

Project to develop standards and criteria for the accreditation of nursing and midwifery courses leading to registration, enrolment, endorsement and authorisation in Australia – Registered Nurses (Attachment A2)

Perhaps most importantly, The Council of Deans of Nursing and Midwifery strongly support the assertion of what constitutes a University (p.9) outlined within the ANMC document.

Domain 1

Standard 1

p. 11 - With regards to Description of processes to ensure equivalence of course outcomes, there needs to be some clarification as to whether offshore teaching will in fact be accepted in courses in the future (as phrased currently it could be). This then leads to the question 'what would be the level of English required for the off-shore component of a programme?'

[REDACTED]

[REDACTED]

In the evidence guide one can see no reason why only 1st year and pre-registration practicum arrangements would need to be presented and also, why this is not mandated material. Council's view is that all professional experience arrangements should be mandated as evidence for accreditation of a course leading to Registration.

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