

**RELEASED UNDER THE
FREEDOM OF INFORMATION ACT 1982 (Cth)**

Chair,
Nursing and Midwifery Board of Australia

Dear Madam,

Re: Consultation paper on registration standards and related matters issued by the Nursing and Midwifery Board of Australia

Thank you for the opportunity to provide feedback on the Nursing registration standards proposal. As a nurse employed in a senior management position in a major tertiary hospital I am extremely cognisant of the need for nursing registration standards that will ensure that nurses are competent to provide nursing services and that there is evidence that their education and experience is relevant to their continued registration. I would like to provide feedback on the four areas proposed for the Nursing registration standards.

Criminal History Check

A Criminal History Check is only relevant for the time period that is immediately prior to the check being performed and does not take into consideration any criminal event that occurs after. This is a failing in this being used as a checking system unless these checks are reassessed at predetermined terms.

English Language Skills

From my own experience of internationally qualified applicant or international nurses who undertook their education in an Australian University, achieving a score of 7 or more in the IELTS examination does not guarantee competence in English language at a level required by a health practitioner especially as the examination does not consider health / medical terminology. While a person may be very competent in conversational English there does not always translate to the person being competent in health / medical terminology. I am unaware of any avenues that this is currently tested or anywhere that specific health / medical terminology is taught for international nurses.

Professional indemnity insurance arrangements standard

I agree that all registered nurses and midwives must be covered in the conduct of their practice by appropriate professional indemnity insurance arrangements that meet certain minimum requirements.

Continuing professional development standard

I agree that all registered nurses and midwives should demonstrate that they participate actively in their continuing nursing professional development but I do question if 20 hours per year is the best measure of completing this requirement. Another option that should be considered is similar to other professional groups which are required to complete a minimum number of credit points of continuing professional development per year. The value in the point system that there is a clear defined value placed on each educational activity and that there is a standard applied to what a point is worth. I do not believe that there is a need to define a requirement of three different types of activities. For example if I am enrolled in a Graduate Diploma program which will enhance my professional and personal skills and knowledge I do not believe I should be required to differentiate different types of activities involved in this program of study.

Yours sincerely


Nursing Director