

Consultation report

Proposed Guidelines for privately practising nurses

August 2025

Overview

The Nursing and Midwifery Board of Australia (NMBA) works with the Australian Health Practitioner Regulation Agency (Ahpra) to help protect the public by regulating Australia's nurses and midwives. We work in partnership to ensure the community has access to safe healthcare provided by nurses and midwives.

The NMBA develops registration standards, professional codes, guidelines, and standards for practice which, together, establish the requirements for the professional and safe practice of nurses and midwives in Australia.

The review process is consistent with the NMBA's commitment to regulatory evidence-based structures, systems, and processes. The review of the Guidelines for privately practising nurses (PPNs) was done as part of the NMBA's regulatory (strategic) workplan. It was informed by an internal desktop review and preliminary consultation phase with key stakeholder groups and a public consultation phase. This report details the process of the review. The NMBA sincerely thanks all those who contributed to the review and provided valuable feedback during the consultation process.

Introduction

The development of proposed *Guidelines for privately practising nurses* (the guidelines) was a new regulatory initiative that formed part of the NMBA’s regulatory plan. The strategic aim was to provide regulatory support for the emerging areas of private practice by nurses participating in models of care outside a traditional health service, with a focus on cosmetic nursing (referred to now as non-surgical cosmetic procedures), professional indemnity insurance (PII), and health records management.

The first phase included an exploration of relevant Australian and international literature via an internal desktop review of regulatory guidelines for self-employed nurses. Following the review, proposed guidelines were drafted and tested with key stakeholders during the preliminary consultation phase in 2023. The feedback received during this phase was, in general, supportive of the proposal.

Public consultation

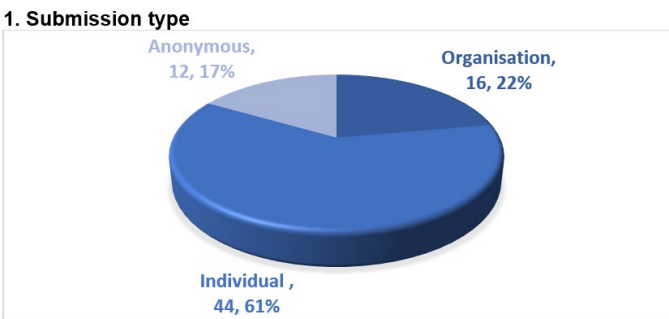
The NMBA released the proposed guidelines for public consultation on 1 March 2024, for a six-week period. A series of strategies were implemented to promote awareness of the public consultation, including a formal public consultation package that was sent directly to NMBA key stakeholders.

All nurses and midwives were sent the NMBA e-newsletter, advising them of the public consultation and how to participate, with a link to the NMBA public consultation webpage. Submissions could be provided either by written feedback or directly via a link to the consultation featured on the NMBA webpage. The following is a summary of the feedback from the submissions received.

Submissions

In total, 72 submissions were received by the NMBA. One third (20) of the total identifiable responses (60), were either from an organisation or individual from the non-surgical cosmetic procedural sector. Graph 1 outlines the types of individual/organisations that responded to the public consultation.

Graph 1



The consultation invited respondents to comment on key aspects of the proposed guidelines. A web-based software platform was used for the online submissions. Seven questions were analysed in the consultation. Each question was optional and did not require completion to progress to the next question.

Table 1 provides a breakdown of the questions asked and the number of responses to each question.

Table 1 Question response numbers

	Question	Response numbers
1	Is the content of the proposed revised guidelines helpful, clear and relevant? If not, please explain why.	56
2	Is there any content that needs to be changed, removed, or added in the proposed guidelines? If yes, please provide details.	44
3	Would the proposed guidelines result in any potential negative or unintended	43

	Question	Response numbers
	effects for people requiring healthcare, including vulnerable members of the community who may choose to access PPN services? If yes, please provide details.	
4	Would the proposed guidelines result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples? If yes, please provide details.	40
5	Would the proposed guidelines result in any potential negative or unintended effects for PPNs.	40
6	Are there any other potential regulatory impacts that the NMBA should consider? (refer to the NMBA statement of assessment at Appendix B)	39
7	Do you have any other feedback on the proposed guidelines?	41

Summary of feedback to consultation questions

Written submissions and online survey responses indicated general agreement that the concept, structure, and content of the proposed guidelines were relevant.

There were requests for more detail on the regulatory evidence to support the development of the proposed guidelines. Other responses sought clarification on the applicability of the proposed guidelines for nurses working in the non-surgical cosmetic procedural context of practice.

Most respondents generally agreed that the proposed guidelines did not further limit or have negative or unintended effects for people requiring healthcare, or vulnerable members of the community (including Aboriginal and/or Torres Strait Islander Peoples). Some respondents suggested there would be a negative impact on service accessibility and service costs.

Outcome

The highly informative and valued feedback has enabled the NMBA to identify alternative regulatory strategies, rather than continuing with the proposed development of *Guidelines for privately practising nurses*.

The NMBA is aware of the risks the context of practice in non-surgical cosmetic procedures pose to the public (predominately in private settings.) In tandem with this review, the NMBA committed to strengthening its [position statement on nurses and cosmetic medical procedures](#).

Over time, the risk to the public increased across the National Accreditation and Registration Scheme (National Scheme) involving other registered health practitioners working in the cosmetic medical procedure sector. For consistency, a collaborative approach that included the nursing profession was adopted to address the known risks to the public. After extensive consultation, the [Guidelines for practitioners working in non-surgical cosmetic procedures](#) were published, succeeding the NMBA *Position statement on nurses and cosmetic medical procedures*.

Taking this and the current regulatory evidence available into account, the NMBA re-evaluated the risk to the public, with an aim to optimise the safe and professional practice of privately practising nurses without imposing an unnecessary regulatory burden.

The NMBA found there was minimal (if any) risk to the public. No privately practising nurses, (other than those working in the non-surgical cosmetic procedure area), had faced regulatory actions by the NMBA. The consultation also identified that there were no stakeholder concerns regarding professional indemnity insurance (PII), despite this previously being suggested as an issue.

To improve a consistent approach to regulation across the National Scheme, the NMBA has approved for use the resources for [Managing health records](#) to support privately practising nurses in maintaining accurate and timely health records required to keep the public safe. This practice aligns them with other regulated health professionals who work privately.

The NMBA is satisfied that the comprehensive and extensive existing resources provide a range of information appropriate to support the regulation of privately practising nurses.

The NMBA has up-to-date practice standards, codes and guidelines that constitute the professional practice framework (PPF), and establish the requirements for the professional and safe practice of enrolled and registered nurses in Australia, regardless of their practice setting. This includes but is not limited to the following standards, codes, and frameworks:

- [Code of conduct for nurses](#)
- [Code of ethics](#)
- [Decision-making framework for nursing and midwifery](#)
- Registration standard: [Continuing professional development](#)
- Registration standard: [Professional indemnity insurance arrangements](#)
- Registration standard: [Recency of practice](#)
- [Enrolled nurse standards for practice](#)
- [Registered nurse standards for practice](#)

Conclusion

The NMBA upholds its commitment to ensuring nurses and midwives are regulated according to public safety needs. This review identified that the existing regulatory resources available adequately support privately practising nurses to meet their regulatory obligations and practise safely, regardless of practice setting. These resources currently address any public safety needs without the provision of additional regulatory requirements for privately practising nurses. If privately practising nurses emerge as a risk to the public in the future, the NMBA will reassess the safety of the public and need for additional regulation to address those risks.