



Q1.

Introduction

The Nursing and Midwifery Board of Australia (NMBA) and Australian Health Practitioner Regulation Agency (Ahpra) are consulting on the proposed **Guidelines for privately practising nurses**. We welcome feedback from organisations, registered health practitioners and the public.

The questions in this consultation relate to the proposed proposed ***Guidelines for privately practising nurses***.

Please read the [public consultation paper](#) before responding. All questions are optional, and you are welcome to respond to any you find relevant, or that you have a view on. It will take approximately 15 minutes to complete this survey if you answer all questions. (upon completion of the survey there is an option to save a copy of your responses for your records) The consultation is open for 6 weeks. The submission deadline is close of business **12 April 2024**.

How do we use the information you provide?

The consultation is voluntary. All data collected will be treated confidentially and anonymously. Data collected will only be used for the purposes described above. We may publish data from this consultation in internal documentation and any published reports. When we do this, we ensure that any personal or identifiable information is removed. We do not share your personal information associated with our consultations with any party outside of Ahpra except as required by law. The information you provide will be handled in accordance with [Ahpra's Privacy Policy](#).

Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know if you do not want your submission published. We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details. We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include published experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982 (Cth)*, which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or if you want us to treat all or

part of it as confidential. **Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.**

If you have any questions, please contact the [Nursing and Midwifery Board of Australia](#).

Please click on the ARROW below to start the survey.

The NMBA and Ahpra acknowledge the Traditional Owners of Country throughout Australia and their continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures and Elders past and present.

Q46. Are you completing this submission on behalf of an organisation or as an individual?

- ☐ Organisation
- ☒ Individual

Q47. Your details

Name

Suzanne Higgins

Organisation

Email

Q49. **Publication of your submission**

Q48. Do you give permission for your submission to be published?

- ☒ Yes - publish my submission **with** my name / organisation name
- ☐ Yes - publish my submission **without** my name
- ☐ Yes - publish my submission **without** my organisation name
- ☐ Yes - publish my submission **without** both my name and organisation name
- ☐ No - **do not** publish my submission

Q34. **Guidelines for privately practising nurses**

Q32. 1. Is the content of the proposed revised guidelines helpful, clear and relevant?

- ☒ Yes
- ☐ No

Q33. Please explain why

This question was not displayed to the respondent.

Q35. Guidelines for privately practising nurses

Q36. 2. Is there any content that needs to be changed, removed or added in the proposed guidelines?

☒ Yes

☐ No

Q37. Please provide details

With so many links to other documents, I wonder if this set of guidelines is actually required? Perhaps an overarching statement with an expectation that PPN conduct their practice/service, in keeping with all these Codes of conduct or whatever term best explains the expectations. All PPN are registered (I presume) and therefore already commit to practice standards, ethical standards and quality healthcare standards.

Q40. Guidelines for privately practising nurses

Q38. 3. Would the proposed guidelines result in any potential negative or unintended effects for people requiring healthcare, including vulnerable members of the community who may choose to access PPN services?

☒ Yes

☐ No

Q39. Please explain why

Potentially PPN may cease to practice or may sanitise their way of service delivery thus forgoing the multi-dimensional art/craft/skill of nursing. In addition there appears to be a requirement for more documentation, professional development, clinical record keeping, supervision requirements, venue related maintenance and cleaning that suggests to me the overheads of private practice may require fee increases which increase cost to consumers (while medicare rebates remain modest).

Q41. Guidelines for privately practising nurses

Q42. 4. Would the proposed guidelines result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples?

- ☐ Yes
- ☒ No

Q43. Please explain why

This question was not displayed to the respondent.

Q44. **Guidelines for privately practising nurses**

Q45. 5. Would the proposed guidelines result in any potential negative or unintended effects for PPNs?

- ☒ Yes
- ☐ No

Q46. Please explain why

As mentioned in 3

Q48. **Guidelines for privately practising nurses**

Q55. 6. Are there any other potential regulatory impacts that the NMBA should consider? (refer to the NMBA statement of assessment at Appendix B)

- ☐ Yes
- ☒ No

Q56. Please explain why

This question was not displayed to the respondent.

Q54. **Guidelines for privately practising nurses**

Q47. 7. Do you have any other feedback on the proposed guidelines?

☒ Yes

☐ No

Q52. Please provide details

Private practice for nurses is very challenging and often unsustainable financially and yet the consumer values nurses as a significant part of the health care team. These proposed guidelines don't come across as supportive, encouraging or promoting nurses in private practice

Q53. Thank you for your submission to the Nursing and Midwifery Board of Australia (NMBA) regarding the proposed ***Guidelines for nurse practitioners privately practising nurses***. The NMBA will review and consider all feedback received before finalising the guidelines. (upon completion of the survey there is an option to save a copy of your responses for your records)

Should you have any questions please contact nmbafeedback@ahpra.gov.au. Once again we thank you for taking time to provide feedback.