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Australian College of Mental Health Nurses response to the consultation paper on registration standards and related matters

Introduction

The Australian College of Mental Health Nurses (ACMHN) has endeavored to provide a considered and detailed response on the proposed registration standards issued by the Nursing and Midwifery Board of Australia (NMBA). Nevertheless the ACMHN is very concerned that the time frame available for consultation is less than adequate. The *Health Practitioner Regulation National Law Act 2009 (Qld)* very clearly requires the NMBA to undertake **wide ranging consultation** about the content of the registration standards. As a professional organisation, wide ranging consultation to us means seeking comprehensive feedback from the membership, the profession and stakeholders – something that is not possible within a 28 day period. Having said that, the ACMHN is happy to assist the NMBA in any way it can to consult with the mental health nursing profession and assist the Board in any future deliberation in regard to mental health nursing.

This response outlines the ACMHN perspective on the mandatory registration standards, it also addresses the issue of the identification of specialist mental health nurses ('endorsement'). In preparing this response to the NMBA, the ACMHN has sought comments from its members on the registration standards. It has also sought comments from its members and the broader mental health nursing community around the issue of 'endorsement'. The ACMHN has also urged members to send comments directly to the NMBA.

'Endorsement': Identification of the Mental Health Nursing Workforce

At present, mental health nurses are identified via a 'psychiatric/mental health endorsement' on the nursing register across 5 jurisdictions in Australia. As the specialist professional body for mental health nurses, the ACMHN believes it should have been specifically consulted on the issue of endorsement prior to the Board publishing its draft position on this matter.

The ACMHN conducted a simple poll of members and non-member mental health nurses (de-identified) around the issue of endorsement. All College members (around 2000 mental health nurses) were sent an email asking them to vote and to also encourage their colleagues to vote. We gave a brief overview of the current position of the NMBA and outlined some pros and cons of 'endorsement' in respect to the College. We encouraged participants to review the consultation documents

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provided by the NMBA, in more detail for themselves.

The poll was open from Monday 16th November to Monday 23rd November and 1,625 votes were collected. Of these, an overwhelming number (1,470 -90.4%) voted in favour of the ACMHN pursuing a process of identifying mental health nursing as a specialist area within nursing.

There was a also a strong argument put forward by some members that 'endorsement' was not a preferred option for the growth and development of the profession and that the College's Credential for Practice Program was more viable and progressive option.

This outcome demonstrates a lack of support, by the profession, for the NMBA's current position on endorsement of mental health nurses.

The ACMHN believes that this is an extremely important issue for the profession and for the Australian community, for a number of reasons, but primarily, because the accurate identification of specialist mental health nurses, in whatever form that may take, is of vital importance in planning for the future of mental health service development and delivery.

The Australian Institute for Health & Wellbeing (AIHW) has clearly identified, in the 'Burden of Disease and Injury in Australia 2003' study, that mental disorders constitute the leading cause of disability burden in Australia, accounting for an estimated 24% of the total years lost due to disability. The Australian Bureau of Statistics 2007 National Survey of Mental Health and Wellbeing found that an estimated 3.2 million Australians (20% of the population aged between 16 and 85) had a mental disorder in the twelve months prior to the survey.

Identification of the mental health nursing workforce is an essential feature in planning to meet the service development and delivery requirements for the future.

The ACMHNs sees the move to a national registration as an ideal opportunity to comprehensively consult with the profession about how best to more clearly articulate the specialist mental health nursing workforce.

Therefore, the ACMHN formally requests that the NMBA consult with the ACMHN to develop a process by which the Board engages in wide ranging consultation with the mental health nursing profession and other stakeholders, including consumer and carer stakeholders, to more closely examine the associated workforce and service

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issues, and to develop a process to identify mental health nursing as a specialist area within nursing.

Response to the mandatory registration standards

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The ACMHN notes that the all ten health practitioner Boards are required by legislation to establish registration standards on 5 mandatory matters. In addition, they have chosen to establish a common standard across the 10 health professions in regard to said English language skills.
The ACMHN supports the establishment of common standards on these issues across the professions. However, the ACMHN believes that the Boards will need to establish a clear and transparent process to ensure that the individual Boards implement the standards in a consistent fashion.

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2.2 English Language Skills

Proficiency in spoken and written English language is vital for the competent practice of mental health nursing. The ACMHN is strongly of the belief that, where English is identified as the practitioner's second language, English language skills should be tested and/or evidence is provided that educational qualifications were conducted in English.

The ACMHN believes that nurses and other health practitioners working in mental health require English language skills at a higher IELTS than is currently proposed by this standard (IELTS 7).

The ACMHN would advocate for nurses working in mental health to enter practice with an IELTS level 8.

Rationale: For mental health nurses, the development of a therapeutic relationship with a client requires the use of 'self'. The primary tool used by mental health nurses to do this, is their capacity to communicate with patients / clients about complex and uniquely individual subjects. Mental health nursing focuses on how people with mental health problems relate their inner world to the external world and as such, mental health nurses require a fluent understanding of the social, emotional and cultural meanings and the nuances of language.

To be considered current, the IELTS test result should be no more than two (2) years old.

The definition of 'international students' seems adequate.

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months
maternity leave, will be able to maintain their registration.

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