



RELEASED UNDER THE  
FREEDOM OF INFORMATION ACT 1982 (Cth)

# australian nursing federation

24 November 2009

Attention: Chair  
Ms Anne Copeland  
Nursing and Midwifery Board of Australia  
natboards@dhs.vic.gov.au

Dear Ms Copeland

**Re: Consultation Paper on Registration Standards and Related Matters**

The Australian Nursing Federation (ANF) was established in 1924. The ANF is the national union for nurses, midwives and personal care assistants however titled, with Branches in each State and Territory of Australia.

The ANF is the largest professional and industrial organisation in Australia, with a membership of over 170,000 members employed in a wide range of enterprises in urban, rural and remote locations in both the public and private sectors. The ANF's core business is the industrial and professional representation of our members and of the industry of nursing and midwifery.

The ANF participates in the development of policy in nursing, nursing regulation, health, community services, veteran's affairs, education, training, occupational health and safety, industrial relations, immigration, foreign affairs and law reform.

We refer to your paper of 27 October 2009 inviting comments on the registration standards and related matters.

The nursing and midwifery professions continue their strong support for the establishment and implementation of a national regulation and accreditation scheme, ensuring protection of the public and maintaining the highest standards of nursing and midwifery services through a transparent and well designed model.

Our eight state and territory Branches have reached a consensus view in relation to the matters raised in your correspondence and we are pleased to provide the following comments.

We note that throughout the consultation document reference is made to guidelines, in many respects it is difficult to make fully informed decisions regarding aspects of the paper without seeing the guidelines, despite this and the extremely short time frame for responses given the size and scope of the paper we have responded but in the future would appreciate both more time and information.

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The ANF has significant concerns that replicating a similar system to that already in place will perpetuate the current problems associated with testing. Despite the wide recognition of these tests, there is significant discrepancy in the IELTS results.

An example that demonstrates our concern is an applicant may have achieved the required score 18 months ago and continued working in their country of origin during which time their proficiency may decline significantly. Conversely an applicant may have attained the required score 2.5 years ago and spent the entire time working and living in an English speaking environment therefore demonstrating the arbitrary nature of the test.

Notwithstanding the above, accessibility to testing centres is widely recognised to be limited and often confined to metropolitan areas.

Consequently the ANF has formed the view that IELTS should be evaluated in the workplace to determine whether or not it should be used as the primary measure for determining English language proficiency.

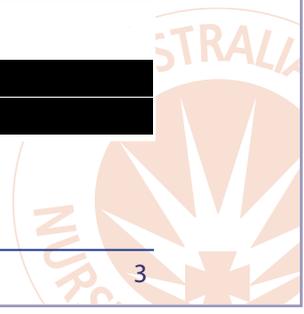
We are also of the view that it is important the National Board consider other forms of demonstrated proficiency should it be available.

In addition there currently exists an inconsistency between the achieved score required for entering university, as opposed to entering the Vocational Education and Training (VET) sector for nursing education. The ANF is of the view there must be consistency between entry scores for both of these educational institutions.

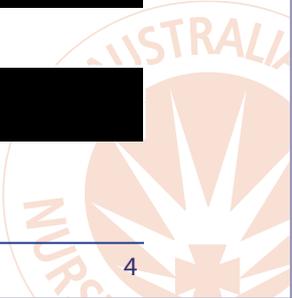
With respect to part 1(a) in the exemptions we recommend the list of countries should be removed on the basis the introductory paragraph describes '*where English is the native or first language*' rendering the listing of the countries redundant.

Part 1(b) should be removed as even in periods of limited registration demonstration of English language proficiency by legitimate methods is an important standard to maintain.

[REDACTED]



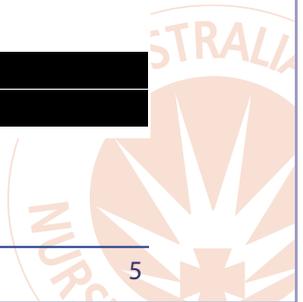
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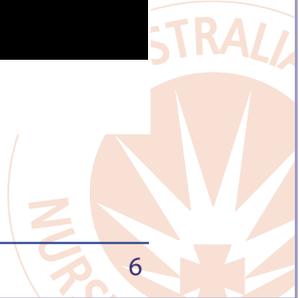
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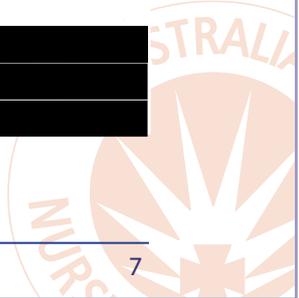
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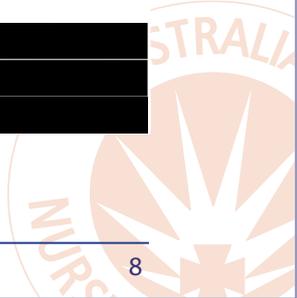
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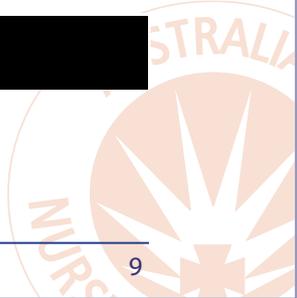
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Yours sincerely

  
**Ged Kearney**  
Federal Secretary

  
**Lee Thomas**  
Assistant Federal Secretary

