



Submission to the Nursing and Midwifery Board of Australia on the Consultation paper on draft accreditation standards for Nursing and Midwifery

17 November 2009



1. Introduction

The Queensland Nursing Council (QNC) values the opportunity to comment to the Nursing and Midwifery Board of Australia (the Board) on the draft standards to assess accreditation of nursing and midwifery courses leading to registration, enrolment and endorsement. In assessing the standards QNC would like to acknowledge the work of the Australian Nursing and Midwifery Council in researching and developing the draft standards and the accompanying framework.

The comments attached herewith will address pertinent points of the standards, taking into account areas outlined in the Council of Australian Governments (COAG) document: *Best Practice Regulation: A guide for ministerial councils and national standard setting Bodies. October 2007*. In addition, the response will address areas of interest to the Board, namely:

- The extent to which the proposed standards are consistent with the COAG guiding principles for best practice regulation
- The extent to which the proposals meet international standards
- The extent to which, if any, the proposals move beyond current states and territories.

It is acknowledged that the four sets of standards have been developed after consultation with practitioners, educators and regulatory/accreditation staff, as well as personnel from organisations representing the interest of their various disciplines.

This submission will outline comments under the headings provided in the consultation paper:

1. General comments on the package as a whole
2. National accreditation framework
3. Accreditation standards – registered nurse
4. Accreditation standards – enrolled nurse
5. Accreditation standards – nurse practitioner
6. Accreditation standards – midwife.

2. General comments on the package as a whole

The QNC is of the opinion that the package provides the tools for a comprehensive and rigorous assessment of courses leading to registration, enrolment and endorsement within the confines of a workable framework.

The formatting of the package is such that it is easy to follow and is in simple language allowing education providers to address the standards systematically with a full understanding of the intent of the standard as well as providing an “evidence base” to which education providers can refer to substantiate various points within their submission.

Further, the QNC favours the provision of four sets of standards as opposed to the “one standard fit’s all” policy that it currently has in place.

Four separate sets of standards allows scope for education providers to address the nuances of the various categories of courses to be accredited, thereby providing opportunity to address the various standards according to the organisational structure, the quality improvement and the auditing processes within their organisation. The QNC acknowledges the differences in processes in relation to audits and quality improvement between the different categories education providers, particularly those within the Vocational Education (VET) sector to those within the Higher Education (Higher Ed) sector. Given that the majority of organisations conducting the *Diploma of Nursing* are within the VET sector, and most of the graduate degrees within the Higher Ed sector, the standards will allow these organisations to include aspects of their audits within their responses to the various standards.

In addition, QNC believes that the provision of four sets of standards allows the education provider opportunity to be innovative in the various pathways that lead to enrolment in their course and in the way that each individual course may be conducted, allowing for each educational organisation to respond to the requirements of their local community, as well as providing an overall curriculum that will produce safe and competent practitioners.

It is obvious within the draft standards that the developers have taken into account the criteria as described in the World Health Organization’s (WHO) *Global standards for the initial education of professional nurses and midwives* (Global standards). All four sets of the proposed standards address part two of WHO’s Global standards, program development section, including such themes as:

- Governance
- Accreditation
- Infrastructure
- Partnerships
- Curriculum design
- Core curriculum
- Curriculum partnerships
- Assessment of students
- Academic faculty
- Clinical faculty
- Professional development
- Admission and selection policy
- Student type and intake.

3. National Accreditation Framework

Comments in relation to the National Accreditation Framework are formatted herewith under the major headings as outlined the Australian Nursing and Midwifery Council (ANMC) 2007/2009 (amended) document. Comment is given only where QNC wish to commend or recommend changes to the document being considered.

Purposes of a national framework for professional course accreditation	
1.1.1 Assurance of graduate competency outcomes	<p>QNC believes that the ethos as outlined in this section is sound, and will provide assurance that all graduates will achieve agreed outcomes within the accreditation standards.</p> <p>Further, QNC endorses a process where assessment of the subject matter outlined above, as per the WHO Global Standards is paramount.</p>
1.1.2 Facilitation of continuous improvement in the quality of professional education	<p>Whilst QNC agrees that continuous improvement process are primarily the responsibility of the institution in collaboration with other agencies, QNC is mindful of the role of the differing processes of accreditation between agencies involved in the VET sector audits and the Higher Ed audits. Whilst both auditing processes have their merits, QNC is of the opinion that there should be nursing and midwifery input into these audits which should be individualised and not be “bundled” with other courses within the educational organisations.</p> <p>QNC is further mindful that the processes and tools utilised within audit processes undertaken by VET and Higher Ed sectors are very generic in nature and are developed according to the type of course offered at the organisation. That is, the VET sector audits are designed to assess competency based courses whilst the Higher Ed sector audits are designed to assess higher academic processes.</p>
1.2.2 Facilitation of consistency in the assessment of overseas applicants for registration or enrolment with criteria for local graduates in all Australian jurisdictions	<p>The QNC strongly endorses national consistency in relation to both Australian graduates and assessment of qualifications obtained abroad.</p>
Principles guiding a national framework for professional course accreditation	
2.1.2 Legitimacy	<p>The QNC endorses the ethos of legitimacy within the accreditation framework.</p>
2.1.3 Validity	<p>The QNC endorses the intent of the standards to be evidence based and explicitly related to graduate outcomes.</p>
2.1.4 Efficiency	<p>The QNC endorses the intent of the standards not to be unnecessarily burdensome. The QNC believes that the draft standards will achieve this.</p>

2.1.6 Transparency	The QNC strongly endorses the intent of the standards to be transparent to both the professions and the public.
2.1.8 Ensures procedural fairness	The QNC endorses procedural fairness within the process. Further, it is believed that this will be achieved within the proposed framework.
2.1.9 Facilitates quality and improvement	The QNC believes changes to courses during the accreditation period through a quality improvement process should not be unnecessarily burdensome. However it is believed that major changes should be reported to the accreditation authority. The proposed standards will achieve this both through the submission of mid-term reviews and through the requirement of educational organisations to report on major changes. QNC recommends that an outline of such changes should be communicated with the educational organisation when accreditation is granted.
2.1.10 Exhibits flexibility and responsiveness	The QNC believes that the proposed standards should not inhibit organisations from being innovative and flexible. It is believed that both the standards and the process employed in accreditation will achieve this.
Necessary graduate competency outcomes	
The QNC agrees that the standards should be based on the current ANMC competency standards and codes as outlined in the submission.	
Accreditation criteria	
4.1 Education Institutions	The QNC agrees with the intent of the submission that where an education provider is accredited by another agency, it should not be re-examined. Further the QNC is of the opinion that the processes utilised by other accrediting/auditing agencies should be open and transparent and made available to the accreditation committee for examination. The QNC is mindful of the processes involved in the auditing/accreditation processes (see comments under 1.1.2)
4.2.1 Governance	The QNC agrees with the intent of the submission in that risk management strategies for the course and the students should be scrutinized and that facilities and resources must be of sufficient quality and quantity across all campuses.
4.2.3 Students	The QNC strongly agrees that students should be offered a variety of pathways to enrol in courses, and that English language competence, special assistance and student support is paramount.
4.2.5 Curriculum content	The QNC agrees with that the core curriculum content should be visible in the curriculum and that individual curricula should be responsive to the jurisdiction or region in which the course is conducted.
4.2.8 Professional experience	Formal agreements should be transparent and comprehensive, and that staff responsible for the supervision of students should be appropriately qualified and oriented to the role. Further, QNC believes that as far as possible clinical experience should articulate with the theoretical studies, and that where this is not possible, education providers should provide a detailed explanation of the pedagogical justification as to why.

National accreditation process	
5.1 Relationship with registration	QNC strongly believes that accreditation of a course must occur before the course commences and students are enrolled.
5.3 Authorities and personnel	QNC endorses the intent of the framework that personnel involved in the accreditation process should be impartial and expert. In addition QNC agrees that consumers should be a part of the accreditation team. QNC recommends that the term “consumers” be defined. That is, is the consumer a member of the public, or a student undertaking a course leading to registration, enrolment or endorsement?
5.5 Application for accreditation	QNC endorses the notion of agreed timelines for accreditation. QNC recommends that this section of the framework be further enhanced by defining upper limits of the time spent assessing submissions.
5.6 Self assessment by course providers	QNC agrees with the intent of this point in that relevant documentation and evidence is provided by the education provider. QNC believes that the format of the proposed standards will allow the education provider to achieve this with minimal duress.
5.8 Site visits to education providers	QNC strongly agrees that site visits are a valuable part of the accreditation assessment. QNC would like to see this point expanded to include <i>all campuses</i> of the education provider where courses are conducted.
5.12 Any review process	QNC agrees with the notion that education providers may request a review on the basis of alleged failure of the accreditation committee to follow appropriate process or to meet specified standards for decision making and reporting. QNC believes that a specified timeline eg. three months, should be included to allow for an expeditious review.
5.14 Reporting during the accreditation period	QNC recommends that at a minimum the mid-term report on each course should include a summary of the evaluations obtained from students, teachers clinical facilities and clinical coordinators.
5.16 Standardisation and national management of data	QNC strongly agrees that a publicly available list of all accredited courses should be maintained.

4. Proposed standards – Registered Nurses

Comments in relation to the *Registered nurses standards with evidence guide* are formatted herewith under the major headings as outlined the Australian Nursing and Midwifery Council (ANMC) 2009 document. Comment is given only where QNC wish to commend or recommend changes to the document being considered.

Preamble	
QNC agrees and commends ANMC on the formatting of the standards. QNC believes that the document which includes a statement of intent, the standards underpinned by criteria and an evidence guide is well thought out, easy to follow and will streamline the accreditation process for both the education provider and the accreditation team.	
Course Management - Governance	
Standard One Criteria (1)	<p>The QNC is of the opinion that nursing courses can be conducted in a variety of educational settings. Further, the QNC is aware of the major differences in the teaching and learning processes and content in relation to the Diploma of Nursing and the Bachelor of Nursing.</p> <p>QNC believes that any organisation that can meet the required proposed standards is at liberty to conduct a Bachelor of Nursing. Further, QNC believes that rigorous <i>external</i> audits of the education provider should be regularly conducted, and the audit reports made available to the accrediting team. At a <i>minimum</i> these should rigorous assessment of:</p> <p>Internationalisation/international activities:</p> <ul style="list-style-type: none"> International partnerships for teaching and research; international student experience (onshore); internationalisation of curriculum; trans-national education and evidence of equivalence; student exchanges; staff exchanges and partnerships. <p>Curriculum and Assessment:</p> <ul style="list-style-type: none"> Course profile and planning; curriculum development, design and review; graduate attributes; workplace learning; academic integrity; course approval/accreditation process; assessment design and practice, including moderation; course and discipline renewal, professional accreditation. <p>Admissions and Progress:</p> <ul style="list-style-type: none"> Admissions criteria; selection and admission process; articulation and credit transfer; learning and personal support for students; equity groups; retention and success/progress for different cohorts. <p>Quality of Teaching:</p> <ul style="list-style-type: none"> Scholarship of teaching and pedagogy; evaluation of teaching and impact on learning; enhancement of skills; professional development; recruitment of staff; performance management.

	<p>Learning Outcomes:</p> <ul style="list-style-type: none"> Curriculum development, design and review; graduate attributes; workplace learning; academic integrity; assessment design and practice; recognition of qualifications; further study; employment. <p>Flexible or Blended Learning:</p> <ul style="list-style-type: none"> Scholarship of teaching and pedagogy; curriculum development, design and review for flexible learning; assessment design and practice; equivalence in learning outcomes; learning support; staff professional development, IT and infrastructure. <p>Research:</p> <ul style="list-style-type: none"> Approach to management; teaching-research nexus; concentration of effort; collaboration and partnerships; retention and development of researchers; scholarship; academic integrity; especially ethics of research; consultancy; commercialisation; use of infrastructure. <p>Research Training:</p> <ul style="list-style-type: none"> Approach to management; admission criteria; supervision and student evaluation of supervision; support for research students and supervisors, including collaboration and partnerships; research degree 'curriculum', skills development and graduate attributes; retention and progress; career planning. <p>Engagement:</p> <ul style="list-style-type: none"> Approach to and scholarship of engagement; relationship to teaching and research; roles and responsibilities; stakeholder involvement; relationship management. <p>Academic Governance:</p> <ul style="list-style-type: none"> Structures and roles; quality management system; curriculum development and review; learning and teaching development and pedagogical issues; academic culture and integrity. <p>Student Experience:</p> <ul style="list-style-type: none"> Understanding the student population and student life cycle; academic aspects e.g. learning support; personal and social support; equity groups; grievances and problems; amenities and facilities; multi campus and offshore operations; alumni. <p>Workforce Planning and Renewal:</p> <ul style="list-style-type: none"> Planning and skill requirements; recruitment, reward and retention; equity groups; managing change and transition; casual staff; academic workloads; organisational climate and communication. <p>Career Development and Performance Management:</p> <ul style="list-style-type: none"> Planning and skill requirements, career development support for teaching and research; general staff career development, casual staff career development; performance management; organisational climate and communication. <p>QNC further believes that if the above processes are met, at education provider level, competition within the educational sectors will be achieved. The nationalisation of the accreditation process will allow for public, private, Higher Ed and VET sectors to compete on a level playing field at a national rather than a state and territory level.</p>
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Students	
Standard Three Criteria (1) & (2)	QNC believes that these points should include the words “prior to enrolment”.
Course length and structure	
Standard Four Criteria (1)	<p>QNC believes that these criteria should read: “That, for courses leading to registration as a nurse, the minimum qualification must be a bachelor degree (or where relevant a post-graduate qualification) and the minimum length of the course must be equivalent to six semesters full-time”.</p> <p>Further, the QNC believes that a definition of a full-time semester should be included in the submission.</p>

5. Proposed standards – Enrolled Nurses

Comments in relation to the *Enrolled nurses standards with evidence guide* are formatted herewith under the major headings as outlined the Australian Nursing and Midwifery Council (ANMC) 2009 document. Comment is given only where QNC wish to commend or recommend changes to the document being considered.

Governance	
Standard one Criteria (1)	<p>The QNC is of the opinion that nursing courses can be conducted in a variety of educational settings. Further, the QNC is aware of the major differences in the teaching and learning processes and content in relation to the Diploma of Nursing and the Bachelor of Nursing.</p> <p>QNC believes that any organisation that can meet the required proposed standards is at liberty to conduct a Diploma of Nursing. Further, QNC believes that rigorous <i>external</i> audits of the education provider should be regularly conducted, and the audit reports made available to the accrediting team. At a <i>minimum</i>, QNC believes that education providers must show evidence of VET sector quality assurance and accreditation processes.</p>
Students	
Standard three Criteria (1) & (2)	<p>QNC believes that these points should include the words “prior to enrolment”.</p>
Course length and structure	
Standard four Criteria (1)	<p>QNC strongly endorses the requirement that the minimum qualification for an enrolled nurse should be at Diploma level.</p>

6. Proposed standards – Nurse Practitioner

Comments in relation to the *Nurse Practitioner standards with evidence guide* are formatted herewith under the major headings as outlined the Australian Nursing and Midwifery Council (ANMC) 2009 document. Comment is given only where QNC wish to commend or recommend changes to the document being considered.

Governance	
Standard one	
Criteria (1)	<p>The QNC is of the opinion that nursing courses can be conducted in a variety of educational settings. Further, the QNC is aware of the major differences in the teaching and learning processes inherent in post graduate nursing courses.</p> <p>Further, QNC believes that rigorous <i>external</i> audits of the education provider should be regularly conducted, and the audit reports made available to the accrediting team. At a <i>minimum</i> these should rigorous assessment of:</p> <p>Internationalisation/international activities:</p> <ul style="list-style-type: none"> International partnerships for teaching and research; international student experience (onshore); internationalisation of curriculum; trans-national education and evidence of equivalence; student exchanges; staff exchanges and partnerships. <p>Curriculum and Assessment:</p> <ul style="list-style-type: none"> Course profile and planning; curriculum development, design and review; graduate attributes; workplace learning; academic integrity; course approval/accreditation process; assessment design and practice, including moderation; course and discipline renewal, professional accreditation. <p>Admissions and Progress:</p> <ul style="list-style-type: none"> Admissions criteria; selection and admission process; articulation and credit transfer; learning and personal support for students; equity groups; retention and success/progress for different cohorts. <p>Quality of Teaching:</p> <ul style="list-style-type: none"> Scholarship of teaching and pedagogy; evaluation of teaching and impact on learning; enhancement of skills; professional development; recruitment of staff; performance management. <p>Learning Outcomes:</p> <ul style="list-style-type: none"> Curriculum development, design and review; graduate attributes; workplace learning; academic integrity; assessment design and practice; recognition of qualifications; further study; employment. <p>Flexible or Blended Learning:</p>

	<ul style="list-style-type: none"> Scholarship of teaching and pedagogy; curriculum development, design and review for flexible learning; assessment design and practice; equivalence in learning outcomes; learning support; staff professional development, IT and infrastructure. <p>Research:</p> <ul style="list-style-type: none"> Approach to management; teaching-research nexus; concentration of effort; collaboration and partnerships; retention and development of researchers; scholarship; academic integrity; especially ethics of research; consultancy; commercialisation; use of infrastructure. <p>Research Training:</p> <ul style="list-style-type: none"> Approach to management; admission criteria; supervision and student evaluation of supervision; support for research students and supervisors, including collaboration and partnerships; research degree 'curriculum', skills development and graduate attributes; retention and progress; career planning. <p>Engagement:</p> <ul style="list-style-type: none"> Approach to and scholarship of engagement; relationship to teaching and research; roles and responsibilities; stakeholder involvement; relationship management. <p>Academic Governance:</p> <ul style="list-style-type: none"> Structures and roles; quality management system; curriculum development and review; learning and teaching development and pedagogical issues; academic culture and integrity. <p>Student Experience:</p> <ul style="list-style-type: none"> Understanding the student population and student life cycle; academic aspects e.g. learning support; personal and social support; equity groups; grievances and problems; amenities and facilities; multi campus and offshore operations; alumni. <p>Workforce Planning and Renewal:</p> <ul style="list-style-type: none"> Planning and skill requirements; recruitment, reward and retention; equity groups; managing change and transition; casual staff; academic workloads; organisational climate and communication. <p>Career Development and Performance Management:</p> <ul style="list-style-type: none"> Planning and skill requirements, career development support for teaching and research; general staff career development, casual staff career development; performance management; organisational climate and communication.
Students	
Standard three	
Criteria (1) & (2)	QNC believes that these points should include the words "prior to enrolment".
Evidence Guide criteria a - e	QNC strongly endorses the criteria as set out in the ANMC document, including that nurses enrolling in nurse practitioner courses should have a minimum of five years full-time experience.

7. Proposed standards – Midwives

Comments in relation to the *Midwives standards with evidence guide* are formatted herewith under the major headings as outlined the Australian Nursing and Midwifery Council (ANMC) 2009 document. Comment is given only where QNC wish to commend or recommend changes to the document being considered.

Governance	
<p>Standard one</p> <p>Criteria (1)</p>	<p>The QNC is of the opinion that midwifery courses can be conducted in a variety of educational settings. Further, the QNC is aware of the major differences in the teaching and learning processes inherent in midwifery courses.</p> <p>Further, QNC believes that rigorous <i>external</i> audits of the education provider should be regularly conducted, and the audit reports made available to the accrediting team. At a <i>minimum</i> these should rigorous assessment of:</p> <p>Internationalisation/international activities:</p> <ul style="list-style-type: none"> International partnerships for teaching and research; international student experience (onshore); internationalisation of curriculum; trans-national education and evidence of equivalence; student exchanges; staff exchanges and partnerships. <p>Curriculum and Assessment:</p> <ul style="list-style-type: none"> Course profile and planning; curriculum development, design and review; graduate attributes; workplace learning; academic integrity; course approval/accreditation process; assessment design and practice, including moderation; course and discipline renewal, professional accreditation. <p>Admissions and Progress:</p> <ul style="list-style-type: none"> Admissions criteria; selection and admission process; articulation and credit transfer; learning and personal support for students; equity groups; retention and success/progress for different cohorts. <p>Quality of Teaching:</p> <ul style="list-style-type: none"> Scholarship of teaching and pedagogy; evaluation of teaching and impact on learning; enhancement of skills; professional development; recruitment of staff; performance management. <p>Learning Outcomes:</p> <ul style="list-style-type: none"> Curriculum development, design and review; graduate attributes; workplace learning; academic integrity; assessment design and practice; recognition of qualifications; further study; employment. <p>Flexible or Blended Learning:</p>

	<ul style="list-style-type: none"> Scholarship of teaching and pedagogy; curriculum development, design and review for flexible learning; assessment design and practice; equivalence in learning outcomes; learning support; staff professional development, IT and infrastructure. <p>Research:</p> <ul style="list-style-type: none"> Approach to management; teaching-research nexus; concentration of effort; collaboration and partnerships; retention and development of researchers; scholarship; academic integrity; especially ethics of research; consultancy; commercialisation; use of infrastructure. <p>Research Training:</p> <ul style="list-style-type: none"> Approach to management; admission criteria; supervision and student evaluation of supervision; support for research students and supervisors, including collaboration and partnerships; research degree 'curriculum', skills development and graduate attributes; retention and progress; career planning. <p>Engagement:</p> <ul style="list-style-type: none"> Approach to and scholarship of engagement; relationship to teaching and research; roles and responsibilities; stakeholder involvement; relationship management. <p>Academic Governance:</p> <ul style="list-style-type: none"> Structures and roles; quality management system; curriculum development and review; learning and teaching development and pedagogical issues; academic culture and integrity. <p>Student Experience:</p> <ul style="list-style-type: none"> Understanding the student population and student life cycle; academic aspects e.g. learning support; personal and social support; equity groups; grievances and problems; amenities and facilities; multi campus and offshore operations; alumni. <p>Workforce Planning and Renewal:</p> <ul style="list-style-type: none"> Planning and skill requirements; recruitment, reward and retention; equity groups; managing change and transition; casual staff; academic workloads; organisational climate and communication. <p>Career Development and Performance Management:</p> <ul style="list-style-type: none"> Planning and skill requirements, career development support for teaching and research; general staff career development, casual staff career development; performance management; organisational climate and communication.
Academic staffing	
Standard two	
Criteria (4)	QNC recommends that criteria 4 should read: "that academic staff members hold a qualification that is higher than or equal to the qualification for which the students they educate are studying".
Students	

Standard three	
Criteria (1) & (2)	QNC believes that these points should include the words “prior to enrolment”.

Course length and structure

Standard four	
Criteria (1)	Exclude the words “university –based”.
Criteria (2)	QNC does not believe that it should be mandatory for a midwifery course to be “planned across a full calendar year”.
Criteria (3)	There should not be a requirement of a minimum course duration of 18 months for a post graduate midwifery course. Some midwifery courses are currently conducted over twelve months. If education providers are able to justify inclusion of the required criteria in less than eighteen months then the course should be considered.
Criteria (5)	QNC believes that to prescribe the amount of theory and practice will limit the innovative capacity of educational organisations when developing curriculum. These criteria should be removed.

Approaches to teaching and learning

Standard six	
Criteria (5) & (6)	These criteria could be combined.

Professional experience

Standard eight	
Professional experience 1 - 9	<p>The QNC has concerns in relation to the prescriptive nature of what is to be achieved during the professional experience component of midwifery courses. QNC believes that many of the criteria are unachievable due to lack of opportunity for student midwives and will result in fewer student midwives entering courses. Additionally, such prescriptive criteria do not allow for innovation in curriculum design or cater for specific geographical/local requirements.</p> <p>It is recommended that this section of the criteria be removed, and that it be left up to the educational organisation in collaboration with the accrediting committee to determine whether the course offered allows an appropriate and full midwifery education.</p>