



Nursing and Midwifery Board of Australia

By email: [nbmafeedback@ahpra.gov.au](mailto:nbmafeedback@ahpra.gov.au)

To whom it may concern

**ACN feedback on the NMBA proposed revised Registration standard: Recency of practice**

The Australian College of Nursing (ACN) would like to thank the Nursing and Midwifery Board of Australia (NMBA) for the opportunity to provide feedback on the proposed revised Registration standard: Recency of practice.

ACN members support Option 2 of the proposed revised Registration standard: Recency of practice and associated guidelines for the reasons provided in the Public Consultation Paper.

ACN promoted this consultation opportunity to our Fellows and members. Their insights and feedback have contributed to ACN's response to the consultation questions as provided below.

*Q1. Is the content and structure of the proposed revised Registration standard: Recency of practice and Guidelines: Recency of Practice clear and relevant?*

The content and structure of the proposed revised *Registration standard: Recency of practice* and *Guidelines: Recency of practice* are very clear, comprehensive and relevant. Confusion about what constitutes 'practice' and non-clinical practice' is common so clarification of what that means in the text and in the Glossary, is a significant improvement. Hyper-links to other relevant NMBA documents embedded in the revised standard is also very helpful as it means that an individual can easily inform themselves and navigate their way through NMBA requirements.

Overall, the revisions are easy to follow and take into account the wide variety of circumstances related to recency of practice.

Note: ACN members raised concerns in regard to the 300 hours of practice required in a five year period as this could lead to unintended consequences. Would like to see the research behind this decision as not included in the consultation paper.

*Q2. Do you support the NMBAs more flexible approach to incremental recency of practice hours and timeframes? Please explain your answer.*

Yes, ACN members are equivocal in their support of the NMBA's more flexible approach to incremental recency of practice hours and timeframes as it appears to recognise the many and varied reasons for (long) absences in a largely female workforce.

But does the proposed incremental criteria actually provide a more flexible approach? The requirement for practice hours in a five year period has increased from 450 hours to 750 hours. An increase in 300 hours, without any identified evidence for change is a concern.

Acknowledge the specific guidance provided is important too, for example, Sections 1-4 under the heading "Pathways for returning to the register" with a helpful diagram in support of the explanatory text for section 4.

*Q3. Do the proposed contents support recent graduates in being safe and competent to practice?*



ACN members were equivocal that the proposed hours within two years of completing nursing studies will ensure that the nurse is safe and competent to practice and importantly, also has the confidence to utilise their nursing skills. There may be unintended consequences, with the proposed requirements for all graduates to complete 300 hours of practice within two years from the date their qualification was awarded. The two year time frame and the barriers that may be encountered inhibiting the ability to satisfy these requirements is considered a concern.

For example if the graduate does not find employment for some time after graduating they could have unintended consequences.

*Q4. Is the proposed content and regulatory outcome for deferred graduates clear?*

ACN considers that the proposed content and regulatory outcome for deferred graduates is clear. However, note response to question three.

*Q5. Is the information in the proposed revised registration standard and guidelines helpful and clear for people who have not practised for 10 years or more?*

ACN acknowledges that the information in the proposed revised registration standard and guidelines is helpful and clear for people who have not practiced for 10 years or more.

*Q6. Is the proposed content for nurse practitioners, endorsed midwives and endorsed registered nurses helpful and clear?*

Yes, the proposed content for nurse practitioners, endorsed midwives and endorsed registered nurses is helpful and clear. ACN, however, recommends considering the information provided below:

- The endorsed midwives and endorsed registered nurses' content could be improved, for example, for those holding an endorsement, change to 'recency of practice hours must be accrued in a context where this endorsement is regularly used'.

*Q7. In the guidelines, is the information on clinical and non-clinical practice helpful and clear?*

Yes, ACN members believes the information on clinical and non-clinical practice is helpful and clear.

*Q8. Is there anything that needs to be added or changed in the proposed revised registration standard and guidelines?*

- Include the number of hours of practice in the previous four years because examples for 2,3 and 5 years are provided.

If you have further enquiries regarding this matter, please contact me, Dr Carolyn Stapleton FACN, Director of Policy, Strategy and Advocacy, at [carolyn.stapleton@acn.edu.au](mailto:carolyn.stapleton@acn.edu.au).

Yours sincerely

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