


Nursing and Midwifery Board Ahpra
GPO Box 9958
Melbourne VIC 3001
By email: nmbafeedback@ahpra.gov.au

Re: Draft Registration standard: General registration for internationally qualified registered nurses

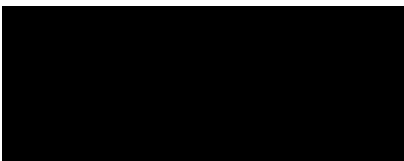
The Australian College of Nursing (ACN) would like to thank the Nursing & Midwifery Board for the opportunity to contribute to the **Draft Registration standard: General registration for internationally qualified registered nurses**.

As Australia's peak professional body representing nursing, ACN is committed to ensuring everyone in Australia can lead a healthy life. Many factors contribute to this aim, including ensuring the community can access appropriate healthcare workers in a timely and affordable fashion. To achieve this aim, suitably educated and experienced nurses are required to provide safe and accessible care across the country. The registration standard will help contribute to that aim.

We have sought input for this consultation from internal ACN staff with a range of experiences and responsibilities. We look forward to seeing the next stage of the review process.

If you would like to discuss this further, please do not hesitate to contact me, the Director of Policy and Advocacy 

Yours sincerely



Director – Policy and Advocacy
Australian College of Nursing
6 October 2023

ACN's response to the NMBA's Draft Registration standard: General registration for internationally qualified registered nurses

Question	Response
1 Do you support the proposed approach in the draft registration standard? Why or why not?	ACN members do not support the proposed draft approach in the draft registration standards. As a peak national nursing body, ACN suggests that the registration standards are inconsistent and do not align with the registration requirements of Australian graduate nurses. ACN is also concerned about objectivity and equity in the registration process and wants to ensure that all the nurses, regardless of their country of origin, are assessed and registered fairly without undue barriers.
2 Is the information in the draft registration standard clear? If no, please explain why.	ACN members believe the draft registration standards are open to interpretation and unclear in their approach and/or objectives.
3 Are the proposed pathways clear and workable? If no, please explain why.	ACN's view is that the proposed pathways are unclear. The unclear and variable pathways could lead to uncertainty and confusion and may not reflect the knowledge and abilities needed for Australian nursing practice.
4 Do you support the requirement for the successful completion of a regulatory examination process for internationally qualified registered nurses in an NMBA-approved comparable international regulatory jurisdiction? Why or why not?	To ensure Australia's standards are competitive and in line with worldwide norms, ACN advocates and supports the regulatory examination process for internationally qualified registered nurses. However, whether the sole qualified nurses from the UK and Ireland will be treated within the same pathways advocated is unclear.
5 Do you support the requirement for 1,800 hours of practice in an NMBA-approved comparable international regulatory jurisdiction/s prior to application for registration in Australia? Why or why not?	ACN members do not support the requirement for 1800 hours of practice in an NMBA-approved comparable international regulatory jurisdiction as these proposed standards make it overly burdensome for internationally qualified nurses to gain registration in Australia. It could deter skilled healthcare professionals from seeking employment in the country. This can have implications for workforce shortages and therefore access to healthcare services.

Question	Response
6 Do you support the draft registration standard being extended to internationally qualified midwives from the NMBA-approved list of comparable international regulatory jurisdictions where midwifery has a comparable educational standard/framework and is regulated as a separate profession, i.e. the United Kingdom, Ireland and relevant Canadian provinces? Why or why not?	ACN suggests that the draft registration standards should be applied to internationally registered nurses and midwives while stating the standards clearly and consistently. Clearly defined criteria help ensure fairness and consistency in the evaluation process.
7 Do you have any other feedback on the draft proposed registration standard?	ACN members recommend ensuring that the language used in the documents is clear and easily understandable. Also, they suggest proposing standards that treat all nurses equitably, regardless of nationality.