



1 June 2009

The Secretary  
Senate Community Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Re: *Inquiry into Health Workforce Australia Bill 2009*

The Australian Nursing and Midwifery Council welcome the opportunity to contribute to the Senate Community Affairs Committee Inquiry into the Health Workforce Bill 2009. The ANMC was established in 1992 to facilitate a national approach to nursing and midwifery regulation. It is the peak body that works with state and territory Nursing and Midwifery Regulatory Authorities in developing standards for statutory nursing and midwifery regulation. These standards are flexible, effective and responsive to the health care requirements of the Australian population.

The ANMC's prime function is to protect public safety in the provision of healthcare through ensuring that nurses and midwives are competent to practise. The comments provided correspond to this remit.

ANMC makes the following general comments in response to the Health Workforce Australia Bill 2009:

ANMC is not directly involved with clinical planning, training and organisation for nurses and midwives; however as the body developing a national approach to the professional standards that underpin nursing and midwifery practice, it has a privileged perspective on a number of the issues addressed in this inquiry.

ANMC acknowledges the benefits of a national approach to planning around clinical education in terms of equity of access to clinical placements and efficiency. ANMC stresses, however, that the primary aim for educating health professionals must be to ensure graduates are safe and competent for the protection of the public. ANMC recommends that this principle be paramount in designing new approaches to clinical training governance and organisation, together with due regard to regulatory authority standards, existing and best practice relationships between educators and service providers, and taking account of the varied needs of the different health professions.

The ANMC has concerns regarding the broad nature of the functions of Health Workforce Australia as described in Part 2-Health Workforce Australia s5 of the Bill. Of particular concern is the wording of s5(1)(f) which appears to confere upon Health Workforce Australia very broad and non specific functions.

S5(3)(a)(b)and s4(a)(b) also indicates that access to financial support of clinical training allocation and of the type of clinical training to be offered to students is to be determined by the Ministerial Council. There is no apparent requirement to include consultation with the National Boards of the health professions, Accrediting Bodies or Professional Bodies. It is difficult to see how this would not impact on the accreditation functions of the Professional Boards and Accrediting Bodies of the health professions who are responsible for determining the standards and criteria for accreditation of educational courses leading

to professional registration and practice. Given the capacity for this to impact the overall standards of educational preparation of health professionals and ultimately of the standard of care to the Australian community the ANMC is concerned that there is no provision within the Bill to ensure a consultation process with these bodies.

The Australian Health Workforce Ministerial Council indicated in its communiqué 8 May 2009, relating to the national registration and accreditation scheme, the importance of the independence of accreditation functions under the new national scheme. The functions as described in s5 and the lack of a required consultation process would appear to contradict that requirement. The Health Workforce Australia will in fact have a considerable amount of control over the accreditation functions of the professional boards and accrediting bodies through control of the clinical component of education courses.

ANMC is also concerned to note that there is no provision in the Health Workforce Australia Bill 2009 for representation by the health professions on the Board of the Health Workforce Agency. It is crucial that the Board of the Health Workforce Agency is able to draw on the available expertise of both the Health Professions and the Education sector in this complex area and that it is representative of all stakeholders.

I look forward to hearing the outcomes of the Senate Community Affairs Committee Inquiry into the Health Workforce Bill 2009.

Yours sincerely



Karen Cook  
Chief Executive Officer