

Submission to the Nursing Council of New Zealand on the draft Enrolled Nurse education standards

Yoobee Colleges: Healthcare Academy External Advisory Committee (HAEAC)

Background

In 2022 Yoobee Colleges funded the development of a programme of study, the New Zealand Diploma in Enrolled Nursing and applied for approval by the Nursing Council of New Zealand (Council) and the New Zealand Qualifications Authority (NZQA). Approval is necessary for eligibility to sit the state final exams that would enable those students that are successful with the exams to be placed on the register for enrolled nurses. The approval process was deferred by the Nursing Council while they reviewed the regulation of enrolled nurses (EN).

In 2022 the Nursing Council began a review of the Enrolled Nurse scope of practice. The outcome of this consultation resulted in the changes to the EN scope which were made public on 23 May 2023. This was followed by a review of the education programme standards and In October 2023 the Nursing Council of New Zealand released the document *Enrolled Nurse education standards* for consultation. The intention is to formally gazette the new scope by mid-2024 along with the newly developed education standards.

Consultation on the proposed changes closes on **5pm Monday 4 December 2023**.

https://www.nursingcouncil.org.nz/NCNZ/News-section/news-item/2023/10/Enrolled_Nurse_education_standards_consultation.aspx

The proposed standards are integrated into the Registered Nurse education standards. Please be advised that the focus of this response only relates to the Enrolled Nurse education standards.

The role of the Nursing Council of New Zealand under the HPCA Act 2003, (the Act), is to accredit education providers and education programmes. One of the key overarching aspects of the Act is to ensure health practitioners under this act meet the requirements to practice within their defined scope. The standards for the EN programme have not been revised since 2010. While the consultation document indicates that there will need to be consequential changes to the RN education standards, this is outside of the scope of this response.

The overarching framework for the consultation document is to have in place generic education standard covering all programmes leading to registration with the Nursing Council, with individual schedules that set out the standards for the New Zealand Diploma in Enrolled Nursing programme.

Response: The Healthcare Academy External Advisory Committee (HAEAC) supports the move to having generic standards with an individual schedule focused on enrolled nursing.

Proposed changes to education standards for EN education programme

There are seven standards under which the proposed changes sit.

Standard One: Te Tiriti o Waitangi partnership obligations

Do you agree with standard one and its criteria?

If so, why?

If not, why not?

Do you think standard one will enable nursing education providers and programmes to meet their Te Tiriti o Waitangi obligations?

What changes would you suggest to standard one to make it more meaningful for nursing education providers and programmes?

The HAEAC have no issues with this standard and recommend that this standard is incorporated into the Education Programme Standards. We do not suggest any changes.

Standard Two: Safe care for the public

Do you agree with standard two and its criteria?

If so, why?

If not, why not?

Do you think standard two will ensure nursing education programmes' focus on safe and socially accountable practice?

What changes would you suggest to standard two to make it more meaningful for nursing education programmes?

This standard relates to education providers preparing nurses to meet the needs of society and communities while also developing the skills professionalism, and the attitudes and skills needed to keep the public safe. The standard contains the criteria for the safety of the public during clinical learning experiences.

The consultation document states that *“An education institution must be accredited by the Council, as per section 12(2) of the HPCA Act 2003 to provide a programme leading to registration as an Enrolled Nurse or Registered Nurse. To deliver the New Zealand Diploma of Enrolled Nursing there must be a formal relationship with an institution offering a Bachelor of Nursing programme.”*¹

Criteria 2.2 states that in order for an education institution to be eligible to offer just the EN programme it would be required to have a formal relationship with an institution offering a Bachelor of nursing programme. This relationship is demonstrated through mechanisms such as a Memorandum of Understanding (MoU).

Yoobee's HAEAC does not support what is being proposed under criteria 2.2 due to the following reasons:

- In the absence of any justification, it is difficult to comprehend how having an MoU will ensure public protection as implied in this Standard.

¹ NCNZ015 Education Standards, p. 11.

- The majority of RN (13) programmes are delivered under Te Pukenga, with 7 universities and 1 wananga also delivering programmes leading to RN registration. As Yoobee would be seen as a competitor in the provision of nursing education, requiring such a relationship creates unnecessary barriers to new entrants into the market and, as such, the HAEAC consider this requirement to be anti-competitive behaviour under the Commerce Act.
- There are a number of educational providers delivering programmes that lead to RN registration however it is noted that a number of these providers only hold a Category 2 EER, lower than Yoobee Colleges which has been assessed as a Category 1 provider.
- The requirements in relation to criteria 2.2 are unnecessary and inconsistent with Standard 3 requirements.

The HAEAC seeks further clarification as to how public safety, which is a paramount consideration, can be assured through an MOU. We consider that there are sufficient quality controls able to be exercised by the Council and NZQA to ensure the quality of an institution delivering a programme and we do not believe what is proposed in this Standard to be appropriate. Institutions should be measured independently against the standards.

We do not support providers of an EN programme requiring an MoU with a provider of an RN programme. Council is putting forward independent practice for ENs while continuing to restrict educational institutes being able to provide an EN programme.

We recommend that educational institutes are assessed on their ability to deliver an EN programme against NZQA and Council criteria without requiring to have an MoU in place with another provider.

Standard Three: Academic governance, leadership and partnership

Do you agree with standard three and its criteria?

If so, why?

If not, why not?

Do you think standard three will ensure appropriate academic governance, leadership, and partnerships?

What changes would you suggest to standard three to make it more meaningful for nursing education providers and programmes?

Do you think criteria 3.1 reflects the positioning of the Head or Lead of nursing to enable quality outcomes from the nursing education programme?

We agree with 3.1 that the education programme is led by a Nursing Council-approved Head/Lead, however what also needs to be taken into consideration is the context of the structure of the institute and how this relationship and overall governance and leadership structural accountabilities are set out to ensure quality outcome.

We seek greater clarification on 3.10 in regard to academic staff and clinical teaching staff required to meet all the requirements and the relationship between this clause and criteria 6.5 which seem to conflict.

Standard Four: Programme of Study (Schedule for EN programme)

Do you agree with standard four, that includes an individual schedule for the EN programme of study, and its criteria?

If so, why?

If not, why not?

Do you think standard four will ensure nursing education providers and programmes enable graduates to achieve safe and competent practice?

What changes would you suggest to standard four to make it more meaningful for nursing education providers and programmes?

Do you agree with the proposed change to ākonga/students completing a minimum of 700 clinical hours and 900 hours if required?

If the number of clinical hours is reduced, what measures would the Nursing Council use to evaluate EN ākonga/students quality learning experiences?

We support the individual schedule for the EN programme of study with the overarching framework for the standards.

We agree that fifty percent of curriculum theory hours have a defined nursing focus.

We agree that the six weeks of continuous transition in final semester as being appropriate in the preparation of nursing students.

We do not think it appropriate to suggest “*if required 900 hours*”. It should be made very clear what the expected hours are. Institutes have policies in place as to how they support learners needing more hours in order to meet the learning outcomes and these requirements are clear in the application forms and handbooks. The statement related to the minimum of 700 clinical hours and 900 if required is ambiguous.

If the clinical hours are reduced the use of programmatic assessments hold a much more vital role in this programme. Our view, however, is that the learner should be advised that 700 clinical hours are a requirement and that any other hours should be left to the discretion of the education provider.

Demonstration of collaboration between the education institute and the clinical provider is paramount.

Education providers will need to be confident that the students can meet the Graduate Profile of the programme.

Standard 5: Student experience

Do you agree with standard five and its criteria?

If so, why?

If not, why not?

Do you think standard five will ensure students are appropriately supported?

What changes would you suggest to standard five to make it more meaningful for nursing education providers, programmes, and students?

We note the requirements are a minimum for supporting students and agree that the criteria meets the requirements.

We support criteria 5.9 in relation to not allowing RPL to be granted for the 240 transition hours in the final semester.

All RPLs require justification that is evidence based underpinned by academic rigour. This needs to be evident for the Council as well as NZQA.

Standard 6: Student Assessment

Do you agree with standard six and its criteria?

If so, why?

If not, why not?

Do you think standard six will ensure assessments are robust and effectively demonstrate graduates meet the competencies?

What changes would you suggest to standard six to make it more meaningful for nursing education providers and programmes?

Formative and summative assessments are key parts of an educational programme. They enable to learner and the programme staff to measure the learner's achievement and intervene in order to put in extra support when there is evidence to suggest that the learner requires this.

We agree that the formative assessments should be able to be signed off by EN or RN. We recommend, however, that summative assessments should only be signed off by practitioners that meet the requirements set out in Standard 3. NZQA requirements are that staff teaching on programmes are required to hold a relevant qualification one level above the programme that is being awarded. Standard six does not meet NZQA requirements and calls into question the accepted pedagogy of holding a qualification above the subject being taught.

Standard 7 Emergency events

Do you agree with standard seven and its criteria?

If so, why?

If not, why not?

Do you think standard seven will enable nursing ākonga/students to contribute during such emergencies to support communities?

What changes would you suggest to standard seven?

Our view is that this decision ultimately should sit with the education institution to negotiate with the clinical placements and students. The education institution has responsibility for the student and their educational outcomes.

We agree with 7.4 reduced clinical hours in an emergency situation with the substitution being at the discretion of the Head/Lead, as well as being documented and reported to Council.

Conclusion

We appreciate the opportunity to provide feedback on these draft education programme standards. Yoobee's HAEAC would be happy to meet with Council representatives to discuss and clarify the points raised.