



01 December 2023

Catherine Byrne
Chief Executive/Registrar
Te Kaunihera Tapuhi o Aotearoa
Nursing Council of New Zealand
PO Box 9644
WELLINGTON NZ 6141

Dear Catherine

Response Te Kaunihera Tapuhi o Aotearoa Nursing Council of New Zealand: Proposed changes to the nursing education programme standards leading to registration as an Enrolled Nurse (EN), and amendments to the education standards for programmes leading to registration as a Registered Nurse (RN).

Thank you for the opportunity for the Nursing and Midwifery Board of Australia (NMBA) to provide a response to the consultation on the proposed changes to the nursing education programme standards leading to registration as an Enrolled Nurse (EN), and amendments to the education standards for programmes leading to registration as a Registered Nurse (RN). I am pleased to provide the following response from the NMBA.

The NMBA notes the proposed new restructured the standards into those that are generic and those that are specific to the programme being offered. The NMBA supports and commends actions centred around strengthening Te Tiriti o Waitangi partnership obligations and learning outcomes and reflecting the position of Kawa Whakaruruhau and cultural safety. Education providers demonstration of authentic partnerships and relationships that support co-design, co-delivery, and review with iwi, hapū, and Māori, will promote the development of kaupapa Māori and mātauranga Māori nursing education programmes that include a Māori world view of health will encourage and support Māori in the nursing workforce. This will enable nursing education providers and programmes to meet their Te Tiriti o Waitangi obligations.

The NMBA supports the actions articulated in the proposed commitment, to deliver the New Zealand Diploma of Enrolled Nursing programme, there must be a formal relationship with an institution offering a Bachelor of nursing programme. This provides not only an environment where knowledge and expertise, and programme and academic resources can be shared, but has the potential to prepare Enrolled and Registered Nurses to work collegially within a healthcare team. The opportunities for articulation between qualifications and is enhanced for both the EN and RN programme providers is significant.

Identified in the previous NMBA consultation feedback in February 2023, under the Trans-Tasman Mutual Recognition Act (TTMRA) 1997, a practitioner registered in New Zealand for occupations regulated by the National Boards is entitled to be registered and to carry on the equivalent occupation in Australia. RNs and ENs who have current registration in New Zealand may apply for registration with the NMBA. Therefore, implementation of any changes to scope and education standards by the Council, has implications for the NMBA's pathway to registration.

Currently in Australia ENs are educated at a similar level to ENs educated in New Zealand. They are expected to practise within their level of education and competence as well as relevant NMBA-approved standards for practice and decision-making frameworks. There are a number of proposed changes to the nursing education programme standards leading to registration as an Enrolled Nurse

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(EN). This would mean New Zealand ENs are required to work under a different scope of practice with new scope statement that was endorsed by the Nursing Council in April 2023, underpinned by the proposed changes to the nursing education programme standards.

Currently EN's in Australia complete a minimum 18-month diploma of nursing (level 5) and ENs in New Zealand must successfully complete the 18-month diploma of enrolled nursing (level 5 on the New Zealand Qualification Authority framework). The proposed change would see the qualification as a level 5 diploma on the New Zealand Qualifications Framework, comprised of 180 credits, of which 30 credits must be at level 6, recommending diploma of Enrolled Nursing programmes include one paper at level 6 (30 credits) in the final semester. Has a gap analysis of the new EN scope of practice and mapping of the existing nursing curriculum informed this proposed change to the nursing education programme standards leading to registration as an Enrolled Nurse (EN)?

The NMBA is interested to understand the proposed change to ākonga/students completing a minimum of 700 clinical hours and 900 hours if required. Further clarification is required on the 200-hour reduction if required, and how was this reduction calculated, to ensure safe regulatory outcomes. All ākonga/students are required to complete a 240-hour (6 weeks) continuous transition to practice course in the final semester of their programme where they are assessed against the competencies for Enrolled Nurses in the proposed reduction of the clinical experience. If there is 260 hours in final semester but there is a minimum of 700, does that mean that the reduced clinical experience hours if required occurs in the earlier placements? Will the reduction of 200 hours be measured or validated over a certain period of time; this was unclear in the document.

The NMBA notes the proposed changes to RN ākonga/students completing a minimum of 1,000 clinical hours and 1,100 hours if required. How was this reduction of 100 hours calculated and evidenced to ensure safe regulatory outcomes. The Council could evaluate RN ākonga/ students quality learning experiences using the Australian Nursing Standards Assessment tool (ANSAT) based in RN and EN standards for benchmarking, which has a Global Rating Scale (GRS) numerical scoring methodology. The National Placement Evaluation Centre (NPEC) has developed the National Placement Evaluation Tool (NPET) for all nursing students and academic and clinical staff, this data is captured online.

The NMBA notes the Te Kaunihera Tapuhi o Aotearoa Nursing Council of New Zealand proposed key change enabling ENs to hold clinical teaching and precepting roles in the EN programme delivery and have some concerns about this proposal. The supervision assessment model for clinical teaching and precepting now includes ENs assessing EN's. The Enrolled Nurse formative and summative assessments can be signed off as appropriate, by either an Enrolled or Registered Nurse. The new scope statement states "Enrolled Nurses work with access to and seek, when appropriate, guidance from a Registered Nurse or other registered health practitioner." EN's in clinical teaching and precepting roles will be assessing EN student nurses demonstrate the requirement to seek appropriate, guidance from a Registered Nurse or other registered health practitioner.

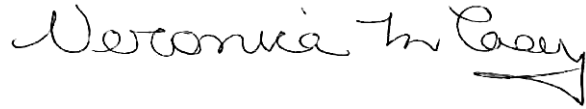
The NMBA works to ensure that Australia's EN's are suitably trained, qualified and safe to practise. This risk-based approach to nursing regulation ensures public safety. Australian ENs applying for registration in New Zealand will be required to work under a different scope of practice underpinned by proposed changes to the nursing education programme standards in New Zealand and the converse will apply to ENs from New Zealand applying for registration in Australia. The NMBA notes that the Council expects to introduce the new education standards from mid-2024 with accreditation against the new standards to begin in 2025. Te Kaunihera Tapuhi o Aotearoa Nursing Council of New Zealand is currently undergoing considerable change, specifically EN nursing regulation and education. The NMBA is undertaking a risk impact assessment to determine the full regulatory implications of EN scope of practice changes and EN education changes in New Zealand, this includes seeking Legal advice.

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Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry, and psychology.

Thank you for the opportunity to provide feedback on the proposed changes. Should you wish to discuss this further please do not hesitate to contact Petrina Halloran, Policy Manager on 08 7071 5552 or via email at Petrina.Halloran@ahpra.gov.au

Yours sincerely

A handwritten signature in black ink that reads "Veronica Casey". The signature is written in a cursive style with a large, stylized flourish at the end of the name.

Adjunct Professor Veronica Casey AM
Chair, Nursing and Midwifery Board of Australia

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