

4 December 2023

Nursing Council of New Zealand
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Wellington Central
WELLINGTON 6011

By email: enreview@nursingcouncil.org.nz

UP EDUCATION: SUBMISSION ON EDUCATION PROGRAMME STANDARDS CONSULTATION

Tēnā koe

Introduction and summary

1. UP Education is providing a submission to Te Kaunihera Tapuhi o Aotearoa | Nursing Council of New Zealand ("**Council**") on its Enrolled Nurse ("**EN**") education standards consultation, included **below**.
2. While we welcome the consultation and are largely supportive of the proposed changes to the Standards, we are concerned about the proposed timing of the consultation. The indicative timeline of the enforcement of the proposed Standards is causing unnecessary delay to the healthcare sector when we are ready to offer our enrolled nurse programme as soon as accreditation is awarded.
3. For the reasons set out in our submission and this letter, we ask that the Council separate the proposed Standard 2.2 from the current review process to accelerate its applicability, or provide a waiver or exemption to the current Standard 1.1 so that our application can be fast-tracked.

The current review process is causing further delays to our accreditation

4. UP Education is the largest private tertiary education provider in New Zealand. We established the Healthcare Academy of New Zealand to expand our offering to respond to the demand from students and the needs of the healthcare sector in Aotearoa New Zealand. We currently offer a Diploma in Health Science and have been working to become accredited to offer a Diploma in Enrolled Nursing. We understand that the healthcare system and nursing profession in Aotearoa New Zealand is under immense pressure due to healthcare worker shortages, adaptation to technical developments and over-reliance on internationally qualified nurses. We hope to lessen these pressures by offering a flexible and responsive programme that gives equitable learning opportunities to students.
5. As you will be aware from our previous correspondence, our dedicated nurse training campus in Central Auckland was ready to start training nurses but has remained empty for a year because Standard 1.1 of the current Enrolled Nurse Education Standards has prevented our accreditation. We agree with its' equivalent, proposed new Standard 2.2 in the current consultation (provided it is clarified further as per our submission) and support this change.

The review process for Standard 2.2 should be accelerated

6. We recognise the need for the review and consultation to take place on the new Standards. However, the indicative timeline of the new Standards applying to accreditation processes from 2025 is an unnecessary delay.

7. We ask the Council to accelerate the consultation process for Standard 2.2 so that the Healthcare Academy of New Zealand can become operational as soon as possible. This would require the Council to address submissions on this point first, so that it can be enforced as soon as possible. The proposed Standard 2.2 could be severed from the rest of the consultation process because it is an administrative / organisational point that will not substantively impact the other proposed standards which may require further review.
8. Alternatively, we ask that the Council use its discretion to waive or exempt UP Education from the current Standard 1.1 and accredit the Healthcare Academy of New Zealand, provided it meets the other accreditation requirements in the usual way.
9. The Health Practitioners Competence Assurance Act 2003 affords the Council wide discretionary powers for the purposes of accrediting educational institutions. There is no legislative requirement for you to accredit educational institutions in a particular way, therefore, the severing of Standard 2.2 from the wider consultation process, or the waiver or exemption of the current Standard 1.1 is a sensible and practical option open to the Council, and is in the public interest.
10. These solutions align with the Council's key priorities to meet the needs of current and future communities. We see the accreditation of educational institutions like ours as a positive addition to the existing options as we would provide access to a flexible programme and ensure Māori and Pasifika students have equitable opportunity to enter the nursing profession.
11. UP Education has a proven track record of delivering industry-leading educational outcomes for Māori and Pasifika learners. We are consistently exceeding industry benchmarks for qualification completion rates for Māori, Pacific and non-Māori and Pacific students. The Healthcare Academy of New Zealand has already engaged with Māori stakeholders to ensure that the Enrolled Nurse Programme will be culturally safe and that our graduates will practice safe care in the communities that they go on to serve.
12. We are committed to providing high quality enrolled nursing education reflective of the Council's goals. We are an independent, private educational institution meaning that we are flexible in our approach to learning and quick to adjust to the changes in the sector, as recognised in your consultation document.
13. We ask for your careful consideration of our requests and we would be happy to answer any questions from the Council about this submission.

Nāku noa, nā

A handwritten signature in blue ink, appearing to read 'Mark Rushworth', with a horizontal line underneath.

Mark Rushworth
Group Chief Executive

UP EDUCATION SUBMISSION ON EDUCATION PROGRAMME STANDARDS CONSULTATION

INTRODUCTION AND SUMMARY

1. UP Education welcomes the opportunity to submit on the proposed Enrolled Nurse Education Standards ("**Standards**") as set out in the consultation document released on 24 October 2023.

About UP Education

2. UP Education is the largest private tertiary education provider in New Zealand with an emerging presence in Australia, operating in 19 cities through 50 campuses. We offer vocational education and training (eg certificates, diplomas and apprenticeships), higher education (Bachelor's and Master's Degrees), and other programmes through university partnerships. We are proud of our training establishments which are all NZQA Category 1 accredited and the educational outcomes for our diverse group of learners which consistently exceeds industry benchmarks.
3. In August 2022, UP Education established the Healthcare Academy of New Zealand ("**Academy**") to expand its offering to respond to the demand from students and the healthcare workforce in Aotearoa New Zealand. The Academy is part of Yoobee Colleges Limited. We currently offer a Diploma in Health Science and, as you may be aware, we have been working to become accredited to offer a Diploma in Enrolled Nursing ("**Enrolled Nurse Programme**"). We do not plan to offer a Bachelor of Nursing ("**Registered Nurse Programme**") (the degree requirement for registered nursing) at this stage. We have a dedicated healthcare faculty and campus located in central Auckland with specialist training facilities and equipment, ready to enrol students into the Enrolled Nurse Programme.
4. This submission is the latest in UP Education's engagement with the Te Kaunihera Tapuhi o Aotearoa | Nursing Council of New Zealand ("**Council**"), following several months of communications. A major barrier to UP Education's accreditation is the current Standard 1.1. While we welcome the changes proposed to its equivalent Standard 2.2 in the consultation document, we wish to raise some points for clarification and suggest alternative options.
5. This consultation is important to UP Education. As a prospective educational institution of nursing, we want to ensure that nursing education is future-proofed and reflective of the health needs of our communities and society.

Summary of UP Education's position on the consultation

6. UP Education welcomes the Council's decision to update the Standards. We acknowledge the work of the Council and understand the importance of this consultation process.
7. We support the proposed design of the Standards which are now specified as generic education standards with an accompanying individual schedule for Enrolled Nurse Programmes and Registered Nurse Programmes. This provides clarity on the applicability of the Standards and is able to adapt to the future realities of the nursing profession.
8. UP Education submits the following regarding the proposed Standards:
 - (a) We agree with Standard One.

- (b) We largely agree with Standard Two and its criteria, however request:
 - (i) a clarification of the proposed Standard 2.2 and what type of institution offering a Bachelor of Nursing programme that it has a formal relationship with is accepted by the Council; and
 - (ii) the efficient progression of accreditation while the education standards are under review. To do so, the Council could sever the proposed Standard 2.2 from the current consultation process, or use its powers to exempt educational institutions seeking accreditation from the current Standard 1.1, and instead accredit based on the substance of the proposed Standard 2.2.
 - (c) We agree with Standard Three with minor modifications for clarification.
 - (d) We largely agree with Standard Four with some modifications.
 - (e) We agree with Standard Five.
 - (f) We largely agree with Standard Six with some modifications.
 - (g) We largely agree with Standard Seven with some modifications.
9. These matters are addressed in further detail below, in order of the priority to UP Education.

SAFE CARE FOR THE PUBLIC MEANS MORE NURSES TRAINED

Summary of the proposed Standard Two

- 10. The proposed Standard Two highlights the importance of the nursing profession in society by ensuring that nurses are prepared to safely meet the needs of the communities that they serve.
 - 11. UP Education submits that safe care will ultimately be addressed by ensuring that there are enough nurses, trained to the Standards of the Council, contributing to the workforce, especially in areas that are particularly underserved such as mental health, Māori and Pasifika health, and in rural locations.
 - 12. This Standard presents an opportunity to effectively ensure safe care. Specifically, UP Education sees the proposed Standard 2.2 as the new equivalent to the current Standard 1.1.
 - 13. The current Standard 1.1 requires an educational institution seeking accreditation for an Enrolled Nurse Programme to also be accredited for a Registered Nurse Programme. The proposed Standard 2.2 instead requires an educational institution seeking accreditation for an Enrolled Nurse Programme to have a formal relationship with an institution offering a Bachelor of Nursing programme (ie Registered Nurse Programme).
- UP Education supports proposed Standard 2.2*
- 14. UP Education agrees with the change and is supportive of the Council also recognising that the current Standard 1.1 is not necessary to providing an Enrolled Nurse Programme that ensures nurses meet the skills needed for public safety. This will allow more educational institutions to offer an Enrolled Nursing Programme.

15. This will be a positive change for the industry given the ongoing shortage of nurses in Aotearoa New Zealand. The more educational institutions are able to be accredited to the standards of the Council, the more accessible these courses will be and the more nurses that we can train and have enter the workforce. Given the shortage of nursing staff worldwide and Aotearoa's growing reliance on internationally qualified nurses, we believe that there is an urgent need to train more nurses in Aotearoa by making nursing programmes more accessible while keeping public safety at the forefront of the profession.
16. Our Academy and the Enrolled Nurse Programme that we can offer is unique to what is currently available. UP Education has proven track record of delivering industry-leading educational outcomes for Māori and Pasifika learners, with 28% of Yoobee Colleges learners being Māori and / or Pasifika.
17. As an educational institution, we are committed to creating learning opportunities that are reflective of the principles of Te Tiriti o Waitangi and ensuring that students are equipped to provide culturally safe care, to address and be aware of health equity issues and contributing factors that affect Māori accessing healthcare in Aotearoa. Ahead of our application for accreditation as an educational institution offering an Enrolled Nurse Programme, UP Education has engaged with Māori and Pasifika stakeholders to ensure that we can contribute to a sustainable workforce.
18. Further, as a private educational institution, we are flexible and able to adapt quickly to the changing nature of the nursing profession and healthcare in general. We encourage and are open to the use of technology in teachings and have strong relationships with industry partners with the ability to access a range of clinical placement opportunities and employment for trained nurses.
19. The proposed Standard 2.2 makes the Council's intentions for safer practice much clearer. We agree that sharing knowledge and resources will instil a team mindset from an early stage of training and benefit both Enrolled Nurses and Registered Nurses.

Clarification on the nature of the relationship required in Standard 2.2

20. We request that the Council provides further clarification on the type of formal relationship that is required and the type of institute needed for this relationship.
21. Our specific points of clarification are outlined below:
 - (a) what type of institution would be acceptable – for example, would an Australian educational institute be accepted?
 - (b) what obligations will need to be contained in the memorandum of understanding ("**MOU**") - for example, would you expect students to be in courses together?
 - (c) Are there any other ways of signalling a formal relationship aside from a MOU?
22. Once the MOU is signed, educational institutions like UP Education would be in a position to progress applications made to NZQA.

Separating Standard 2.2 from the current review

23. In order to address the shortage of nurses (discussed above) and ensure that educational institutions are accredited efficiently, we propose that the Council separate Standard 2.2 from the consultation process and make it applicable as soon as possible.

24. The consultation document indicates that the new Standards would not be in force until 2025. This is a long delay for educational institutions such as UP Education, where we have been prepared to undertake accreditation and offer learning students since August 2022. In this time, we could have more nurses trained and entering the workforce, but this substantial review of the Standards is delaying educational institutions that may be able to receive accreditation immediately.
25. Alternatively, the Council could use its broad discretionary powers under the Health Practitioners Competence Assurance Act 2003 to waive or exempt educational institutions applying for accreditation from having to meet the current Standard 1.1. As evident by the proposed Standard 2.2, Standard 1.1 is no longer relevant to nursing practice.
26. Provided we meet the other requirements, the Council could accredit based on its powers to waive or exempt Standard 1.1 and instead apply the substance of Standard 2.2.

TEACHING AND LEARNING

Submissions on Standard 4 – Enrolled Nurse Schedule

27. We agree with Standard 4.4.
28. We agree with Standard 4.8 but would add that completing the 240-hour continuous transition to practice course in the final semester of their programme is appropriate once students successfully complete all other programme requirements.
29. Further in Standard 4.8, the sentence beginning with "if required, 900 hours" should be omitted. This part of the standard is not appropriate and makes the minimum requirements for clinical hours ambiguous. Educational institutes have the expertise to make their own policies that will be enforced for students requiring support and more clinical learning. In our view if the clinical hours are reduced then assessments will hold much more vital role in this programme. Therefore, our view, 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.
30. We would also emphasise that for the purposes of Standard 4.11 and 4.12, the collaboration between educational institute and clinical provider is paramount, and educational institutes will need to be confident that the students can meet the Graduate Profile of the programme.

Submissions on Standard 6.5

31. Regarding Standard 6.5, we agree that formative assessments could be signed off by enrolled nurses or registered nurses, as appropriate, however disagree with that applying to summative assessments which we believe should only be signed off by registered nurses fulfilling the role of adjunct clinical staff who meet the requirements set out in Standard 3. This standard, as currently drafted, does not align with the NZQA requirement of teaching staff to hold a relevant qualification that is a level above the programme that they are teaching and calls this accepted pedagogy into question.

Submissions on Standard 7.4

32. We understand the importance of consistent and universal expectations during emergency events, and that the Council will be best placed to provide advice if such circumstances were to arise.

33. However, we believe that once an emergency event is established by the Council, the nature of any clinical placement should be determined between the educational institution, clinical placement provider and the student. This is reflective of the educational institution's responsibility for students and their educational outcomes, and an emergency event should not change this role.
34. We agree with reducing clinical hours during emergency events as per Standard 7.4 with substitution of clinical placement hours at the discretion of the Heads or Leads of Nursing Programmes at each educational institution. This would be documented and reported to the Council.

MINOR CLARIFICATION FOR ACADEMIC GOVERNANCE

35. While UP Education agrees that the nursing education programme is led by a Nursing Council-approved Head or Lead, we would also like the Council to acknowledge in Standard 3.1 that this position is integrated into the structure of the educational institution, and the Head or Lead will have other governance and leadership accountabilities aside from the Council. The Council will need to consider the structural context of the institute and how the relationship and overall accountabilities work to ensure cohesion between the Council and the educational institution.
36. The language used in Standard 3.10 should be amended for greater clarity if academic staff and clinical teaching staff must meet all requirements.

TE TIRITI OBLIGATIONS AND STUDENT CULTURE

37. As mentioned above, living out the principles of Te Tiriti o Waitangi is important to UP Education and we agree with Standard One and its proposed criteria.
38. UP Education understands the significant role of nurses in our communities and are committed to living out the principles of Te Tiriti o Waitangi in its educational programmes and creating a learning environment where students can join the profession with sound knowledge of a Māori world view of health.
39. Regarding the student experience, we note that the criteria contained in Standard Five should be a minimum requirement of educational institutions and agree with the criteria being appropriate to providing high-quality student experiences.
40. We agree with Standard 5.9 that the recognition of prior learning ("**RPL**") policy of educational institutions for an Enrolled Nurse Programme is not granted for the 240-hour continuous transition to practice course in the final semester.
41. We would add that all RPL policies are justified with evidence, underpinned by academic rigor.