



22 June 2018

Adjunct Professor Debora Picone AM
Chief Executive Officer
Australian Commission on Safety and Quality in Healthcare
NSQHS Standards
GPO Box 5480
Sydney NSW 2001

Email: NSQHSStandards@safetyandquality.gov.au

Dear Professor Picone

National Safety and Quality Health Service Standards Guide for Governing Bodies Consultation Draft

The Australian Nursing and Midwifery Federation (ANMF) appreciates the opportunity to provide a response to the Australian Commission on Safety and Quality in Health Care (ACSQHC) Consultation Draft for the National Safety and Quality Health Service (NSQHS) Standards Guide for Governing Bodies.

The ANMF is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 268,500 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

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ANMF Journals

Australian Nursing and
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Australian Journal of
Advanced Nursing (AJAN)
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It is the view of the ANMF that the NSQHS Standards Guide for Governing Bodies document reads well overall and will serve as a useful resource for its intended audience.

However, we are concerned about information provided in the section ***Credentialing and scope of practice Actions 1.23 and 1.24*** on pages 32-33, which is not an accurate reflection from a nursing and midwifery perspective. With regard to scope of practice for nurses and midwives there are a range of factors which define scope of practice. While the health service organisation has a role, this is through enabling nurses and midwives to work to their full scope of practice by way of organisational policies and procedures, and employment job descriptions. The professional scope of practice is ultimately defined by what the individual nurse or midwife is educated, competent and authorised to practise governed by legislation, regulation, education and professional requirements.

Again, from the nursing and midwifery professions' perspective, the ANMF is opposed to credentialing for nurses and midwives. Our national position statement, enclosed, details our concerns with credentialing for our professions. The means by which health service organisations can determine that a nurse or midwife is suitably educated and qualified to practice in a safe, competent and ethical manner is provided by the NMBA under the *Health Practitioner Regulation National Law and Other Legislation Amendment Act 2017* (the National Law). Health service organisations should be directed to the Australian Health Practitioner Regulation Agency (AHPRA) national register for this information.

Given the differences between medical and nursing/midwifery clinicians regarding credentialing, and our opposition to credentialing for nurses and midwives, we request the section headed *Credentialing and scope of practice* be reworded to: *Credentialing and scope of practice for medical clinicians*.

The process outlined in **Action 1.24** is clinical privileging and the terminology used in the Standards Guide should be amended accordingly.

We appreciate the opportunity to participate in this consultation process and provide our feedback on behalf of our membership. Should you require further information on this matter, please contact Julianne Bryce, Senior Federal Professional Officer, ANMF Federal Office, Melbourne on 03 9602 8500 or julianne@anmf.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Annie Butler'.

Annie Butler
Federal Secretary
ANMF



Australian
Nursing &
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Federation