



NEW SOUTH WALES NURSES AND MIDWIVES' ASSOCIATION  
AUSTRALIAN NURSING AND MIDWIFERY FEDERATION NEW SOUTH WALES BRANCH



IN REPLY PLEASE QUOTE:

BH:JPU  
Ref:  
14 July 2017

Productivity Commission  
GPO Box 1428  
Canberra City ACT 2600

To National Disability Insurance Scheme Productivity Commission

**Re: National Disability Insurance Scheme Costs Position Paper**

The New South Wales Nurses and Midwives Association (NSWNMA) is the registered union for all nurses and midwives in New South Wales. The membership of the NSWNMA comprises all those who perform nursing and midwifery work. This includes assistants in nursing (who are unregulated), enrolled nurses, registered nurses and midwives at all levels including management and education.

The NSWNMA has approximately 62,500 members and is affiliated to Unions NSW and the Australian Council of Trade Unions (ACTU). Eligible members of the NSWNMA are also deemed to be members of the New South Wales Branch of the Australian Nursing and Midwifery Federation.

Our role is to protect and advance the interests of nurses and midwives and the nursing and midwifery professions. We are also committed to improving standards of patient care and the quality of services in health and age care services.

We welcome the opportunity to make a short response to this Discussion Paper on NDIS Costs.

The NSW Nurses and Midwives' Association (NSWNMA) is largely supportive of the proposed strategy and the need for caution when implementing widespread reform within the disability sector. As a union that represents the nursing and midwifery workforce of NSW, this submission will focus on the 'Workforce readiness' section under issue *b* in the terms of reference:

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Australian Nursing and Midwifery Federation NSW Branch ABN 85 726 054 782 | NSW Nurses and Midwives' Association ABN 63 398 164 405

*The interaction with, and role of, other services in meeting reasonable and necessary support for people with severe and profound disability.*

It is of vital importance that the rights of people living with disability are safeguarded against unsuitable workers through implementation of suitable workforce strategies. Because of the increasing shift to non-nursing models of care within the community based services our members have expressed their concern that traditional registered nursing roles have been replaced by community care worker roles. These roles are not subject to the same professional standards, as these workers are unlicensed and therefore unregulated.

One of our members wrote:

*"I just do not understand why our clients who we have cared for and provided a high level of professional support for years, have now been placed in these group homes with people that just do not have the skills and know them like we did. They have ended up in hospital and they are dying. How are their rights being protected?! I feel so powerless in protecting them now".*

(Registered Nurse, Disability).

The need to maintain a high level of competence and skill is important in providing safe quality care. The appropriate level of skills and competence is essential in providing care to disability clients, particularly where people have high complex healthcare needs, require poly-pharmacy and may have communication difficulties. Within the existing disability nursing workforce there are many skilled and competent professionals who will no longer be part of the workforce. This will mean a significant loss of long-term therapeutic relationships for some current care recipients. This may also mean potential cost-shifting as people may be referred to in-patient care for treatments that could easily be managed in the person's usual place of residence by a registered nurse.

*"An RN can easily replace a tracheostomy tube or gastrostomy tube, but if the skill mix is changed to save money, the plan will say 'Call an Ambulance' thereby putting more demand on the hospital system,"<sup>1</sup>*

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<sup>1</sup> Gary Dunne (2016) *Sell off to hit chronically disabled Peoples inquiry to privatisation*. Lamp

Providers should be required to employ those with the appropriate qualifications and experience to provide safe and high quality care that people with disability deserve. As stated by the National Safety and Quality Health Services *"Managers and the clinical workforce have the right qualifications, skills and approach to provide safe, high quality care"*. (NSQHS-Standards-Sept-2012)<sup>2</sup>.

It is our view that it is important that consideration is given to ensure the vital roles of registered and enrolled nurses are retained in any future workforce planning within the disability sector. Also that opportunity is given for those registered and enrolled nurses currently employed in the sector to transfer into roles within new services that have equitable terms and conditions of service for them. The casual and adhoc subcontractor employment model will not retain current nursing and allied health workers or attract future professionals into these services to care for clients with high and complex care needs.

State government decisions to force current staff into non-government provider positions whilst trying to exit the field is failing with many experienced and expert disability nurses leaving or planning their exit in light of future uncertainty of employment conditions.

Thank you again for the opportunity to provide this brief response. If you need any further information please do not hesitate to contact Joanne Purdue, Professional Officer, at this office.

Yours sincerely

**BRETT HOLMES**  
General Secretary  
NSW Nurses and Midwives' Association

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<sup>2</sup> Australian Commission on Safety and Quality in Health Care (2012) *National Safety and Quality Health Service Standards*.

<https://www.safetyandquality.gov.au/wp-content/uploads/2011/09/NSQHS-Standards-Sept-2012.pdf>