



australian
nursing federation

Submission to the Productivity Commission

Impacts of COAG Reforms: Business Regulation and VET Discussion Paper

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1. Introduction

The Australian Nursing Federation (ANF) welcomes the opportunity to provide a submission to the Productivity Commission's consultation into the impacts of COAG Reforms: Business Regulation and Vocational Education and Training (December 2011). The ANF will limit its commentary to the impacts on the nursing and midwifery profession.

2. About the Australian Nursing Federation

The Australian Nursing Federation (ANF) was established in 1924. The ANF is the largest industrial and professional organisation in Australia for nurses, midwives and assistants in nursing (however titled), with Branches in each state and territory of Australia.

The Australian Nursing Federation's 214,000 members are employed in a wide range of enterprises in urban, rural and remote locations in Australian public and private health services, residential and community aged care sectors that include hospitals, health services, schools, universities, vocational education and training (VET), the armed forces, statutory authorities, local government, offshore territories and industries.

The ANF participates in the development of policy in, nursing regulation, health, community services, veteran's affairs, education and training, occupational health and safety, industrial relations, immigration and law reform. The ANF has also taken a positive role and active leadership in many of the national, state and territory and local activities relating to aged and community care. The ANF is represented on many relevant boards, committees and industry including the Community Services and Health Industry Skills Council and state Community Services and Health Industry Training Boards. The ANF also has representatives that participate in Industry Reference Groups (IRG's) in relation to development and review of nationally accredited training units of competence and qualifications. The ANF is involved with pathways to higher education through its representation on the Australian Qualifications Framework Council's Pathways Policy Reference Group. The ANF has two Branches that are Registered Training Organisations delivering VET courses and qualifications in nursing and VET courses and qualifications that have elements of nursing work embedded within them.

The ANF is the largest union representing workers in the health sector. The eight ANF state and territory Branches have reached a consensus view in relation to the Productivity Commissions discussion paper on the 'Impacts of COAG Reforms: Business Regulation and VET'.

3. Background of the nursing and midwifery workforce

Nurses and midwives form the largest health profession in Australia (ANF 2010b), providing health care to people throughout their lifespan and across all geographical areas of Australia. The depth and breadth of nursing and midwifery practice reaches into: people's homes, schools, general practice, local councils and communities, industry, offshore territories, aged care, retrieval services, rural and remote communities, Aboriginal and Torres Strait Islander health services, hospitals, the armed forces, universities, mental health facilities, statutory authorities, general businesses, and professional organisations.

4. Future of the nursing and midwifery workforce

The nursing and midwifery workforce remains under pressure and it is estimated that Australia is 13,000 nurses and midwives short with an estimated 40% of the workforce due to retire in the next ten years.

It is estimated in the aged care sector alone Australia has an undersupply of nurses of approximately 20,000. The average age of nurses nationally is 52 (midwives 55) and many are looking to leave the workforce over the coming years, making the situation even worse.

"It is generally accepted Australia will continue to experience increasing demand for health care workers and at a rate that will challenge Australia's training and service delivery systems' without significant change to its approach to workforce development. The underlying health service demand drivers include: population growth, ageing of the population, changing nature of the burden of disease and greater focus on health prevention, which taken together with consumer and workforce expectations, combine to result in increasing demand for health care services and for healthcare workforce". (National Health Workforce Taskforce; Health Workforce in Australia and Factors for Current Shortages; April 2009)

The ANF believes education is essential to maintaining the high standard of health care in Australia. Australia's nurses, midwives and assistants in nursing (however titled) must continue to be highly educated and experienced to maintain professional, quality care for all Australians. Australia's nursing workforce is the frontline and often nurses are the only health care clinicians available.

The ANF acknowledges the important changes necessary to ensure a future qualified and robust nursing workforce include:

- Increased undergraduate nursing places in Australian universities;
- Dedicated funding for universities and VET providers to access quality clinical placements programs including professional mentoring arrangements;

- Financial and clinical support for career development and articulated career pathways from Certificate III to post graduate studies;
- Improvement of literacy, numeracy and foundation skills for workers entering the industry; and
- Wage parity for all nurses and assistants in nursing (however titled) in aged care.

5. Nursing education

There are two levels of nurse that are legally regulated within Australia: registered nurses or midwives and enrolled nurses. The education of registered nurses or midwives occurs in the higher education sector. The education of enrolled nurses occurs in the VET sector. The minimum level of qualification for entry to practice for enrolled nurses is contained in the health training package and is variously at the Certificate IV or Diploma level according to jurisdictional requirements and must meet the Nursing and Midwifery Board of Australia's (NMBA) national competency standards for the enrolled nurse (ANF 2010a).

In addition, to the two legally regulated levels there are other groups of workers such as assistants in nursing and midwifery (however titled) that undertake nursing and midwifery work that is delegated to them and are supervised by the registered nurses and midwives.

Specifically, assistants in nursing (however titled) assist registered nurses, midwives and enrolled nurses in the provision of delegated aspects of nursing and midwifery care within the limits specified by their education, training and experience. Assistants in nursing and other unlicensed workers (however titled) work within a plan of nursing or midwifery care developed by the registered nurse or midwife, and work under the supervision and direction of a registered nurse or midwife at all times. Registered nurse or midwife supervision may be direct or indirect (ANF 2007a).

6. The education of assistants in nursing and other unlicensed workers (however titled)

Assistants in nursing (however titled) are employed across a wide range of health and aged care settings in Australia and have a plethora of titles. They may work in acute clinical care settings – in hospitals, day procedure centres and in primary care centres in some Australian jurisdictions. They also work in the slow stream rehabilitation sector of the acute and sub-acute health care system. They predominantly work in the residential aged care sector and residential disability sector. They are also working in the community in home care, public health and aged care. They work with ambulance services and they are privately contracted by individuals to work in homes. (ANF 2009 p.14)

Assistants in nursing (however titled) are accountable for their own actions; however it is the registered nurse or midwife who is always accountable for all delegated functions to these workers. It is the long held position of the ANF that the educational preparation of assistants in nursing (however titled) should be competency based, recognise prior learning and experience, be conducted in the VET sector at a level appropriate to facilitate articulation and credit transfer to other nursing or midwifery programs (ANF 2007a).

It is not mandatory for assistants in nursing (however titled) to hold a qualification in order to gain employment. However, because of the vulnerability of the people who are cared for in the health and aged care systems and the inherent potential for harm in delivering their care, a comprehensive regulatory framework has evolved to manage this risk for most groups of health workers, especially those responsible for direct care and treatment. The role of this regulation has been primarily to achieve particular goals including the setting of standards of education and practice to ensure that health care providers have the necessary job entry knowledge, skills experience, health and character to provide safe and competent care (ANF 2009).

7. Nursing and VET reform

‘VET education is provided throughout Australia in every state and territory in Technical and Further Education (TAFE) systems, adult and community education providers, agricultural colleges as well as the VET operations of some universities, schools and private providers, community organisations, industry skill centres and some commercial and enterprise training providers’ (Commonwealth of Australia 2002; National Review of Nursing 2002; Our duty of Care, Canberra).

Nursing may be offered to students in Years 11 and 12 through the VET in Schools programs and to school leavers as a new Australian Apprenticeship or Traineeship. VET in Schools is designed to expand opportunities and pathways for senior secondary students, and improve educational outcomes in line with State and Territory Government's objective to increase the number of young people completing Year 12 or equivalent. Students in these programs have the benefit of experiencing the type of work available in the public health system or aged care sector by completing clinical work placements whilst completing any one of the following courses:

- Certificate III in Health Service Assistance (Acute Care);
- Certificate III in Allied Health Assistance; or
- Certificate III in Aged Care.

These nationally recognised qualifications are delivered by registered training organisations (RTO's) working in partnership with schools, hospitals and aged care providers.

Completion of one of these courses may provide a rewarding career in itself or students may go on to build on their qualification to undertake further education and training allowing them to specialise in one of the many available health careers including nursing.

The ANF supports the continuation of the VET in Schools program.

Enrolled nurse education is available to school leavers and every school leaver should have a choice of access to VET training or higher education institutions depending on the individual's academic achievements and stratifying entry requirements. School leavers undertaking nursing through an Australian Apprenticeship or Traineeship program have their training costs subsidised by the relevant state or territory government and incentives are also offered to the employers of these students encouraging both personal benefits and support services to the student.

The Certificates IV and V (Diploma) in nursing courses, as previously discussed, have their genesis in the Health Training Package (HLT07), which was collaboratively developed by the Community Services and Health Industry Skills Council (CS&HISC). The CS&HISC represents the national industry standards for health professionals in the VET sector, which includes enrolled nurses. Once a student has been assessed as competent in all aspects of the units of competence that make up either the Certificate IV or V in nursing, they are eligible to make application to the NMBA for nationally recognised registration as an enrolled nurse. The units of competence listed in the HLT07 for enrolled nurses have been mapped to the Australian Nursing and Midwifery Accreditation Council (ANMAC) national competency standards for enrolled nurses.

Many school leavers who complete a VET qualification in (enrolled) nursing continue with their skills progression and undertake advanced nursing studies at the Bachelor or Master degree level using the Australian Qualifications Framework (AQF).

The inclusion of Certificate IV and V nursing programs into nationally accredited training packages has enabled the school leaver to enter into a predominantly articulated pathway between enrolled nursing and other occupations in the healthcare sector, inclusive of Bachelor of Nursing (Certificate VII within the AQF) programs.

The ANF is supportive of a system that enables VET graduates to articulate their qualifications on a skills escalator to higher qualifications both within the VET qualifications framework and the Higher Education framework.

8. Quality of education in VET

The quality of the delivery of VET nursing courses, as well as other VET courses that have elements of nursing work embedded within them, that originate from the nationally accredited Health and Community Training Packages (HLT & CHC TP's) conferring a qualification that leads to employment within the health sector, have long been a concern to the Australian Nursing Federation. The quality delivery of VET education by some registered training organisations (RTO's) in some skills areas at the AQF Certificate III level in aged care, assistant in nursing, and health assistant in nursing and to a lesser degree in Certificate IV – Nursing and Certificate V – (Diploma) – has been widely variable depending on the RTO. All of the nursing programs are scrutinised to meet nursing's professional standards set down by the profession and that meet the ANMAC standards for accreditation of the VET course to be delivered, as well as meeting the criteria for graduates of these programs to be eligible for registration as an enrolled nurse with the NMBA once the student has met all the prescribed standards for enrolment and the competencies associated with their chosen level of VET qualification.

The ANF believes the best option for improving quality at this time is the greater role for the ISCs (and through them the industry parties) in the development of companion manuals relating to assessment of training packages. If these manuals are robust they provide quality auditors/surveyors the tools needed to identify deficiencies in RTO assessment strategies and tools which are at the heart of ensuring good outcomes from training.

9. Sector-specific influences

Within our industry, the need to ensure a capacity to communicate effectively in English especially in programs that require an IELTS (International English Language Testing System) score on completion will require training providers to significantly boost literacy training in addition to existing levels of training required for the qualification.

The ANF believes there is a pressing need to address literacy and numeracy that will ensure workers entering the industry through completion of recognised qualifications are provided with literacy and numeracy training and assessments which meet the oral and written language requirements for their work roles, including being able to undertake appropriate levels of documentation consistent with their work roles and to be able to understand work instructions, policies and procedures associated with their roles.

The ANF believe that VET reforms and policies encouraging increased literacy and numeracy levels will positively influence the potential for workforce participation and productivity flow, social inclusion and an increase in confidence for workers to undertake higher qualifications in their area of work.

The establishment of more effective pathways for career progression within the nursing pathway from workforce entry levels (Certificate III) to the diploma of nursing and to the degree qualification stream for registered nurses and midwives is also a priority focus of the ANF.

There currently exists significant but informal pathways between various Certificate III programs (aged care and health services assistance) and enrolled nursing programs however, there are significant practical issues for RTO's and employers in mapping existing skills and knowledge due to substantial differences in the construction and delivery of courses.

Development of a clear map of knowledge and skills that would assist workers demonstrating recognition of prior learning (RPL) when seeking to upgrade their qualifications would be extremely welcomed by the ANF.

The ANF also supports further options for delivery of the enrolled nurse qualification to best enable nurses to take advantage of RPL and expedite delivery of the qualification to address the evident and increasing nurse shortage.

Qualifications for nursing roles are presently fractured between the higher education sector and the VET sector and, within the VET system between the Community Services (aged care, home and community care) and the Health (enrolled nurses, assistants in nursing –acute care) Training Packages. There is pressing need to develop explicit and effective systems for the development of pathways for workers to acquire knowledge and skills and for employers to develop a workforce that meets the needs of the consumers and their services. However the greatest obstacle to pathways development is the link (or absence of one) between qualifications in the VET sector and those delivered in higher education institutions.

Current qualifications within (and between) the training packages are comprised of units of competence that do not align easily and create practical issues for RTO's in managing RPL and credit transfer arrangements that lead to a real benefit to students/employees in shorter and more individually focused courses and for employers more responsive and more rapid production of the nursing workforce. The CS&HISC is, as part of its ongoing review of training packages, seeking to obtain a better alignment in structure and content of the health and community services packages given the alignment of qualifications and the use of units across these packages.

Unlike the VET sector, courses in the higher education sector do not have common content, instead relying on graduates completing programs meeting common competencies for registration. This creates real issues for consistency in skills recognition given that not all of the education delivered within the diploma of nursing is necessarily delivered in the first six to twelve months of the degree course structures within each of the universities. Given that all states and territories are completing transition to the diploma level for preparation of enrolled nurses in the next year the ANF believes it is

now timely to reach some accommodation over the arrangements for articulation in this area.

10. Scope of the COAG VET reform agenda

The ANF understands the Productivity Commission has been asked to maintain its focus on the:

- Economy-wide, regionals and distributional effects of reforms;
- Take into consideration the costs incurred by governments in implementing reforms;
- Comment on the time period which the effects of reform are likely to accrue;
- Highlight the gaps that actually or potentially limit reform evaluation; and
- Assess whether the countries reform potential is being achieved and the opportunities for improvement.

Given the ANF's interest in representing the views of our nursing and midwifery members, we acknowledge the contribution VET educated enrolled nurses make to the Australian health care system and further outline the important work they do in a range of settings.

The ANF agrees with the discussion draft assumption that an individual's workforce participation and their productivity is enhanced through the attainment of a full qualification above the level of the highest one already held. Nonetheless, we acknowledge the Australian Qualifications Framework (AQF) structures ranging from Certificate level to higher degree qualifications enable changes in attainment for students at the Certificate III/IV level, Diploma and Advanced Diploma and concur such advancement is only possible when a student possesses the necessary comprehensive foundations skills in numeracy and literacy. These foundation skills provide school leavers who transition to the VET sector with the fundamental knowledge base on which to build their education.

Furthermore, we agree the move to a demand driven system in higher education may have ongoing implications for the VET sector, like qualification completion rates that may or may not always meet their desired targets due to changes in markets, the economy or specific industries in times of peak and trough in their demand.

Commonwealth and State funding initiatives to support students in their upward skills escalation are supported. However market based VET funding is cause for concern especially in relation to the quality of training outcomes for both students and potential employers.

11. Opportunities for improvement

The ANF is supportive of the Productivity Commission's summation on the areas for improvement (page 58) and believes more information ought to be available to senior school students, school leavers and parents in relation to the costs associated with VET education and the differences in fees and charges between public and private VET education providers. As we have previously mentioned, the ANF is equally concerned about the quality issues evidenced in a number of reviews and inquiries and is supportive of requirements around auditing and moderation of VET courses in nursing. The ANF supports initiatives that aid in the completion rates of VET nursing programs and believe funding must match the costs associated with the delivery of all VET education programs and more specifically urge special consideration be given to the complexities associated with the delivery of VET nursing programs associated with all the regulatory requirements.

12. Conclusion

There is conclusive evidence available demonstrating that more qualified nurses and nursing support staff leads to better and more positive health outcomes for patients and directly correlates to the quality and quantity of care they receive.

It is the opinion of the ANF that by seriously addressing the quality outcomes of VET qualifications, increasing access to these qualifications, supporting the improvement of the VET workforce and through focused government financial support, the VET sector will be better placed to deliver on the changing needs of the health and community care sectors.

It is the view of the ANF that graduates of VET nursing qualifications are recognised as beginning practitioners in need of more consolidation, learning and growth however they must meet the ANMC competencies for licensure on completion of their qualification. That health programs in the VET sector need to be nationally accredited and approved and aligned to progression to higher qualifications and that all VET training programs that have any aspect of direct client care or direct involvement in decision making about a person in their care be approved by the profession.

The ANF would be grateful if the Productivity Commission would keep the ANF informed of the progress of this draft projects development.

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