



30 July 2008

Secretariat
Review of Australian Higher Education
GPO Box 9880
Canberra ACT 2601

Re: ANMC response to the Review of Australian Higher Education Discussion Paper June 2008

Thank you for providing the Australian Nursing and Midwifery Council (ANMC) with the opportunity to respond to the above discussion paper. The ANMC was established in 1992 to facilitate a national approach to nursing and midwifery regulation. It is the peak body that works with state and territory Nursing and Midwifery Regulatory Authorities in developing standards for statutory nursing and midwifery regulation. These standards are flexible, effective and responsive to the health care requirements of the Australian population.

The ANMC's prime function is to protect public safety in the provision of healthcare through ensuring that nurses and midwives are competent to practise. The comments provided are limited to selected issues corresponding to this remit.

Question 13. How can the quality of learning outcomes in Australian higher education be measured more effectively?

The ANMC notes the discussion on p. 37 and following with regard to the issue of ensuring learning outcomes. The ANMC has developed national competencies for enrolled nurses, for registered nurses, for midwives and for nurse practitioners. These establish the required graduate outcomes for education courses and the minimum standards expected for the protection of the public. They are used as the basis for the professional accreditation of courses.

The national competency standards assist the process of measuring the quality of learning outcomes. They establish minimum standards of professional competence against which student performance is assessed.

Linking learning outcomes to established standards of professional competence is an important means by which to ensure quality learning outcomes.

Question 15. To what extent should vocational education and training and higher education continue to have distinctive missions and how should these missions be defined?

The ANMC notes the comments made on p. 40 with regard to the emerging issue of vocational education and training providers, particularly TAFE institutes, becoming providers of higher education qualifications. To safeguard professional standards and the professional status of nurses and midwives, it is ANMC's position that Bachelor of Nursing and Bachelor of Midwifery courses should continue to be offered only by universities. This position is further articulated in a

position statement on this issue: 'Registered Nurse and Midwife Education in Australia' (February 2008):

http://www.anmc.org.au/docs/guidelines_and_position_statements/Registered%20Nurse%20and%20Midwife%20Education%20in%20Australia.pdf

This position is based on the current situation in which vocational education and training and higher education do have, as the Review describes, distinctive missions.

Question 22. Are there any unintended consequences of the current approach to internationalisation of higher education in Australia?

The ANMC notes the comments made on p. 52 and following of the Review in relation to the international recognition of qualifications and learning outcomes and the demand from students for their qualifications to be recognised in multiple countries.

An issue confronting the nursing and midwifery professions with regard to international recognition of qualifications relates to mandatory minimum hours of clinical experience exceeding those offered currently by courses in Australia. This is an issue, in particular, in regard to the UK and other countries that are part of the European Union where EU directives mandate 2300 hours of clinical experience in undergraduate courses.

There are strong arguments against setting minimum hours to match these requirements, including: that there is little evidence that minimum hours equates to quality learning experiences; that it is arguable that a competency-based approach is a more progressive model than an hours-based approach; and that matching hours to internationally established requirements begs the questions of which countries should be used as the benchmark, whether their own standards are defensible, and the issue of having to alter Australian standards whenever international trends change. There is an argument that the EU directives are anachronistic – set in and reflective of a period, prior to nursing education moving to the higher education context, where nursing competence was assessed on a time-served basis. Further, there is the practical issue of sourcing, and financing, the higher expectations in terms of hours of clinical experience at a time when institutions are already under pressure to resource their courses in terms of clinical placements. This is a problem that extends beyond the nursing and midwifery professions: other health professional courses, including medicine, experience similar problems with securing enough clinical placement resources to satisfy their current needs.

Question 23. What is an appropriate role for government in assisting the Australian higher education system to internationalise? On what principles should this role rest and what purposes should it serve?

In terms of the issues outlined above in response to question 22, there are implications for the role of government in facilitating Australian institutions' ability to afford the higher levels of clinical instruction that would be needed to ensure international recognition of Australian nursing and midwifery graduates in the UK and other EU countries. An alternate strategy and role for government would be advocating in international forums for a different model of recognition of Australian courses that takes into account the competency-based approach to determining graduate competency that is the foundation of the Australian approach. With either approach, the principle on which the government role should rest, and the purpose that it should serve, is to ensure that nurses and midwives graduating from Australian courses are competent to practise, either in Australia or elsewhere.

Please do not hesitate to contact me if you wish to discuss these comments further. I look forward to seeing the outcome of the review.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Karen Cook', with a stylized flourish at the end.

Karen Cook
Chief Executive Officer