



25 February 2013

Mr Gilbert Hennequin
Executive Officer
Aboriginal and Torres Strait Islander
Health Practice Board of Australia
GPO Box 9958
Melbourne VIC 3001

Dear Mr Hennequin

**Aboriginal and Torres Strait Islander Health Practice Board of Australia:
consultation on registration eligibility**

The Australian Nursing Federation (ANF) is a strong supporter of national registration to provide protection for the public in the provision of health and aged care. We therefore welcomed the establishment of the Aboriginal and Torres Strait Islander Health Practice Board, demonstrating support for the Board through our participation in consultation on mandatory registration standards for Aboriginal and Torres Strait Islander Health Practitioners, in 2011.

The ANF is the largest professional and industrial organisation in Australia for registered nurses, enrolled nurses and registered midwives, with Branches in each State and Territory of Australia. Our core business is the professional and industrial representation of members and the professions of nursing and midwifery.

With a membership of over 225,000 nurses, midwives and assistants in nursing, our members are employed in a wide range of enterprises in urban, rural and remote locations in both the public and private health and aged care sectors. ANF members work closely with Aboriginal and Torres Strait Islander Health Practitioners and Aboriginal and Torres Strait Islander Health Workers, in a range of health and aged care and geographical settings.

The ANF holds a strong position that any health or aged care worker engaged in direct care activities with members of the public ought to be registered under the *Health Practitioner Regulation National Law (2009)* (the National Law), to uphold protection of the public principles. Further, we consider that regulation should not be narrowly confined to those health practitioners in overtly 'clinical' roles. To that end, we advocated for, and supported the subsequent move for nursing and midwifery registration to encompass the broader definition of practice as follows:

*Practice means any role, whether remunerated or not, in which the individual uses their skills and knowledge as a nurse or midwife.
For the purposes of this registration standard, practice is not restricted to the provision of direct clinical care. It also includes*

The industrial and professional organisation for nurses and midwives in Australia

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ANF Journals

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australian nursing federation

*working in a direct nonclinical relationship with clients, working in management, administration, education, research, advisory, regulatory or policy development roles, and any other roles that impact on safe, effective delivery of services in the profession and/or use their professional skills.**

The ANF notes from the Aboriginal and Torres Strait Islander Health Practice Board of Australia website, that your Board has also adopted this definition of practice. At present, however, as specified by the Ministerial Council of 2009, current registration under the Aboriginal and Torres Strait Islander Health Practice Board of Australia is restricted to those undertaking 'clinical roles dealing with ... physical health' and holding the qualification Aboriginal and Torres Strait Islander Health Practitioners (Practice).

Your consultation discussion paper indicates that the roles and functions of those who hold the qualification Aboriginal and Torres Strait Islander Health Practitioners (Community Care) encompass a range of client interaction roles, including clinical roles. The role descriptions would seem to the ANF to fit within the definition of practice, as adopted by your Board.

We encourage you to take the opportunity of this consultation process and review of regulatory requirements, to broaden the criteria for regulation of Aboriginal and Torres Strait Islander Health Practitioners and Aboriginal and Torres Strait Islander Health Workers. This would afford protections for both the health professionals and the public to whom they deliver both physical and psychological care services. From the health professional perspective, all Aboriginal and Torres Strait Islander Health Practitioners and Aboriginal and Torres Strait Islander Health Workers should be entitled to enjoy the benefits of national registration, such as: recognisable, nationally consistent qualification levels, codes and guidelines, scope of practice and continuing professional development standards that underpin safe and competent practice; as well as, ease of mobility across jurisdictions. More importantly, from the perspective of the community, registration provides protection mechanisms against occupational groups whose activities pose significant risk of harm to the health and safety of the public.

The ANF appreciates the opportunity to have participated in a stakeholder consultation workshop in Melbourne, and to provide written advice to the on-going development of regulation for Aboriginal and Torres Strait Islander Health Practitioners and Aboriginal and Torres Strait Islander Health Workers.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lee Thomas'.

Lee Thomas
Federal Secretary

*Nursing and Midwifery Board of Australia. 2010. *Recency of practice registration standard*. Available at: <http://www.nursingmidwiferyboard.gov.au/Registration-Standards.aspx>

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