Review of the Arrangements for the Exercise of Accreditation Functions under the Health Practitioner Regulation National Law Act

AUSTRALIAN NURSING AND MIDWIFERY ACCREDITATION COUNCIL

Final Report to the Nursing and Midwifery Board of Australia
Prepared for Consultation with Stakeholders v#3

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Chief Executive Officer
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PURPOSE

The *Health Practitioner Regulation National Law Act 2009* (Qld) in force in each state and territory requires the national boards of regulated health practitioners to review arrangements for the exercise of accreditation functions no later than 30 June 2013. This report provides the Nursing and Midwifery Board of Australia (NMBA)—the National Board for nursing and midwifery professions in Australia—and other stakeholders with an account of the establishment and operations of the Australian Nursing and Midwifery Accreditation Council (ANMAC) as the independent accrediting authority for nursing and midwifery in Australia since 1 July 2010. The report uses the quality framework prepared for the annual reporting to National Boards by accreditation authorities as the basis for providing information. The framework required ANMAC to address the following aspects of its business—governance, independence, operational management, accreditation standards, process for accreditation if programs of study, and education providers and stakeholder collaboration.

ROLE OF ANMAC

ANMAC is the independent accrediting authority for nursing and midwifery under Australian’s National Registration and Accreditation Scheme. It plays a key role in protecting and promoting the safety of the Australian community by promoting high standards of nursing and midwifery education.

In performing its duties, ANMAC sets standards for accreditation for nursing and midwifery programs and accredits education providers and programs of study leading to qualification in nursing and midwifery. ANMAC is also responsible for reviewing and improving accreditation standards for all professional categories under its mandate.

Developing, reviewing and providing policy advice on accreditation and skilled migration matters is also part of ANMAC’s mandate.

ANMAC is registered as a company limited by guarantee with five member organisations:

1. Council of Deans of Nursing and Midwifery (Australia and New Zealand)
2. Royal College of Nursing Australia
3. Australian Nursing Federation

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1 Hereafter referred to as the ‘National Law’.

2 On 1 July 2010, the Australian Health Workforce Ministerial Council appointed the Australian Nursing and Midwifery Council (ANMC) as the independent accrediting authority for the nursing and midwifery professions under the National Registration and Accreditation Scheme. Before the scheme was introduced, ANMC had been the peak body for the nursing and midwifery professions and had developed the codes of professional conduct and ethics, the national competency and accreditation standards used by state and territory based regulatory bodies and subsequently adopted by the new NMBA. Following appointment as the independent accrediting authority, ANMC changed its name to ANMAC to reflect its principle role as an accrediting authority.
4. Australian College of Midwives
5. Congress of Aboriginal and Torres Strait Islander Nurses.

ANMAC’s Board was initially constituted from these member organisations as well as three community members, relevant experts nominated by the vocation education and training sector and representatives from the Australian Government and state and territory governments. The Constitution was amended at the Board’s November 2010 annual general meeting to include on the Board an additional community member and an educational expert from the higher education sector.

VISION AND ACCOUNTABILITY

From the beginning, ANMAC’s goal has been to become a proficient, sustainable accreditation authority. Its vision is to be ‘respected for its leadership in nursing and midwifery accreditation’ and its purpose to ‘ensure that standards of nursing and midwifery education promote and protect the health of the Australian community’.

ANMAC is accountable to the NMBA for assuring the Australian community that nurses and midwives who complete programs accredited by ANMAC can practise and care for people in a safe and competent manner. As an efficient and effective proxy for assessing the competence of every graduate, ANMAC ensures that programs leading to registration and endorsement of nurses and midwives in Australia meet or exceed NMBA-approved accreditation standards. These standards apply to entry to practice education programs leading to registration as an enrolled nurse, registered nurse and registered midwife; as well as endorsement as a nurse practitioner, eligible midwife and remote and isolated practice nurse. ANMAC is also responsible for the accreditation standards for programs for re-entry and entry for internationally qualified nurses and midwives leading to registration. Each set of standards is subject to cyclic review involving broad consultation with the nursing and midwifery professions, educators and other stakeholders.

PERFORMANCE

Establishment of systems and processes

Unlike the accreditation authorities for other health professions in Australia joining the new National Registration and Accreditation Scheme on 1 July 2010, ANMAC had to be created from the ground up. The organisation was only commissioned in April 2010 as the accreditation authority for nursing and midwifery. Each of the other health professions had established national accreditation councils well before the decision to move to the new national scheme; one as early as 1988. This meant that ANMAC had to cope with all of the complexities and challenges that go with being a ‘start up’ company.
Previously, the business taken over by ANMAC was conducted by the nursing and midwifery regulatory authorities in each state and territory. Before the National Registration and Accreditation Scheme, there were eight states and territories, with more than 85 health profession boards governed by 66 Acts of Parliaments. Never before had all of this work been handled by a single authority. It is therefore extraordinary that in two years the organisation is proving itself as a capable and credible accreditation authority. ANMAC’s workload is enormous compared to other accreditation authorities, with a scale and scope unheard of in Australia’s other health professions. The work involved: accrediting up to 480 programs of study; conducted by more than 160 education providers; across two education sectors (higher education and vocational education and training); for programs leading to registration and endorsement in eight categories. The challenges were and remain immense.

Since incorporation, ANMAC and its Board have been diligent in establishing the governance framework and systems needed to underpin the accreditation function.

Board committees were established at the outset to manage key governance responsibilities and the terms of reference for each are being reviewed after two years of operations. Board committees include the:

- Governance Committee
- Accreditation Advisory Committee
- Research, Innovation and Policy Committee
- Finance, Audit and Business Committee
- International Consultative Committee.

Enrolled Nurse, Registered Nurse, Nurse Practitioner and Registered Midwife Accreditation Committees were also established and have met regularly to review the work of the teams assessing programs of study. These committees make recommendations to ANMAC’s Board, which approves them or requests more information.

Important ANMAC policies, guidelines and resources that articulate governance and operations are continuing to be developed and implemented, including:

- National Accreditation Guidelines
- Financial Management Policy
- Transition and Teach Out Policy
- Board and Board Committees Policy and Code of Conduct
• Monitoring Policy
• Risk Management Policy
• Assessors’ Handbook
• Workplace Health and Safety Policy
• Qualifications of Teaching Staff in Accredited Programs Policy
• Enterprise Bargaining Agreement
• Registered Nurse Accreditation Standards
• Delegations of Authority Policy.

ANMAC has made substantial efforts to develop the knowledge and build the data required to discharge its ongoing responsibilities. This has required documenting and classifying the large number of education provider offering programs of study in nursing or midwifery and the status of their accreditation (Table 1). It is estimated that there are more than 160 education providers in all states and territories offering around 480 programs of study leading to qualifications for entry, re-entry or international entry to practice in one or more of the following registration and endorsement categories:

Registration:
• Registered nurse
• Enrolled nurse
• Registered midwife.

Endorsement:
• Nurse practitioner
• Scheduled medicines
• Supply scheduled medicines (rural and isolated practice)
• Scheduled medicines for eligible midwives
• Eligible midwife.

A breakdown of the number of education providers and programs of study by state and territory is in Table 1.
TABLE 1: EDUCATION PROVIDERS AND PROGRAMS OF STUDY BY STATE AND TERRITORY AS AT 31 JULY 2012

<table>
<thead>
<tr>
<th></th>
<th>ACT</th>
<th>NSW</th>
<th>NT</th>
<th>SA</th>
<th>Tas.</th>
<th>Qld</th>
<th>Vic.</th>
<th>WA</th>
<th>AUSTRALIA</th>
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<tbody>
<tr>
<td>EDUCATION PROVIDERS</td>
<td>4</td>
<td>29</td>
<td>5</td>
<td>14</td>
<td>3</td>
<td>27</td>
<td>62</td>
<td>18</td>
<td>162</td>
</tr>
<tr>
<td>PROGRAMS OF STUDY</td>
<td>11</td>
<td>80</td>
<td>13</td>
<td>29</td>
<td>7</td>
<td>55</td>
<td>190</td>
<td>93</td>
<td>478</td>
</tr>
</tbody>
</table>

The 418 programs of study currently accredited and approved by the NMBA are listed on its website, as are expired (‘inactive’) programs: 
[www.nursingmidwiferyboard.gov.au/Accreditation/Approved-Programs-of-Study.aspx](http://www.nursingmidwiferyboard.gov.au/Accreditation/Approved-Programs-of-Study.aspx). A number of these were accredited by state or territory nursing and midwifery regulatory authorities before the National Registration and Accreditation Scheme started.

To support the National Framework for the Accreditation of Nursing and Midwifery Courses Leading to Registration, Enrolment, Endorsement and Authorisation in Australia[^3], ANMAC developed National Accreditation Guidelines for education providers and other stakeholders and Application Packs to guide applicants through the submission process. This material was prepared in close liaison with other health professional accrediting authorities to ensure ANMAC adheres to best practice in managing its accreditation responsibilities.

ANMAC also established policies and procedures for assessment team operations and for the selection, support and payment of assessors.

All education providers conducting a program of study were contacted by ANMAC at the start of operations and information provided to them about the future arrangements for accreditation (including fees) and their responsibilities. Previously, ANMC had conducted education and training seminars throughout Australia to help education providers and other stakeholders understand the implications of a national registration and accreditation scheme.

**Accreditation of programs of study**

When ANMAC started its role as an accrediting authority, the NMBA determined that programs requiring accreditation between 1 July 2010 and 30 June 2012 would be granted an extension of up to two years to give ANMAC sufficient time to establish the policies and procedures required to acquit its responsibilities (the transition period).

Since 1 June 2012, ANMAC has received 153 submissions for accreditation, handled with an average processing time of 45 weeks:

- 66 programs of study were assessed and accredited

[^3]: Referred to hereafter as the National Accreditation Framework—established in 2007 by ANMC in anticipation of a national registration and accreditation scheme.
9 were accredited with conditions
4 were placed on hold to give education providers the opportunity to provide sufficient evidence to satisfy one or more relevant standard by a specified date.

ANMAC also received 113 applications from education providers with existing programs of study that expired during the transition period. Of these:

- 45 programs were discontinued
- 70 indicated they would submit for accreditation
- at least 2 have not responded to enquiries.

Of the 70 education providers submitting applications, 41 programs of study have been assessed by ANMAC and the remainder are being progressed; one program of study is not expected to be submitted until 1 December 2012. Around 60% of previously accredited programs of study (where an education provider submitted a successor program of study for an expired accreditation) have now been assessed by ANMAC.

ANMAC also received 32 requests for major modifications or changes to already accredited programs of study and has assessed 14 of these to date, with an average processing time of 24 weeks. Many more submissions have been received from education providers requesting minor modifications or changes to accredited programs, each of which has been assessed and reviewed by the relevant Accreditation Committee.

The NMBA has approved all programs of study accredited by ANMAC to date. As education providers come and go and programs of study are added or withdrawn, it is not possible for ANMAC to determine the precise number of full accreditation assessments to be conducted by ANMAC going forward. Assuming the numbers of education providers and programs of study remain similar, ANMAC expects to assess between 70 and 90 submissions for accreditation each year until 2016, and between 30 and 40 requests for major changes to an already accredited program of study.

Figure 1 shows ANMAC’s past, current and predicted workload from July 2010 to July 2017. The five-year cyclical nature of the predicted full accreditation assessments are indicated in the peaks in this figure and are attributed to the grouping that occurred during the transition period. ANMAC will be working with education providers in the coming years in an attempt to manage the workload to ensure a more even distribution across a five-year period.
ANMAC has received 14 complaints over the last two years about the conduct of education providers and/or programs of study—10 were successfully resolved (with no appeals) and four are in the process of being resolved. ANMAC has received positive feedback from stakeholders that its complaints process is rigorous and fair. To meet its obligations under Section 50 of the National Law ANMAC has been developing a comprehensive monitoring policy. The policy is designed to ensure ANMAC is satisfied that education providers and their accredited programs of study meet approved accreditation standards. ANMAC will monitor compliance through a risk-rated approach, to maximise the effectiveness of resources applied to the monitoring function and provide a safeguard that enrolled students complete programs of study that comply with relevant accreditation standards.
Monitoring accreditation performance

ANMAC’s Board monitors ANMAC’s performance as an accrediting authority by reviewing the following performance indicators:

- **Accreditation workload:** Number of programs requiring accreditation by category; number of accreditation applications received; number of assessments underway; number of accreditations completed; and delays in assessment and causes.
- **Monitoring accredited programs:** Number of complaints about the conduct of education providers and/or accredited programs of study; number being investigated; number of investigations completed; review of reporting required from education providers; and other aspects of monitoring.
- **Accreditations compared to budget:** Number of equivalent completed accreditations compared to budget.

Standards for accreditation

The intellectual property for the National Accreditation Framework and all accreditation standards developed by the ANMC was retained and are in use. In contrast, documents developed by ANMC before the National Registration and Accreditation Scheme was introduced—including the codes of professional conduct and ethics, ANMC National Competency Standards for the Enrolled Nurse, Registered Nurse, Registered Midwife and Nurse Practitioner, along with other important national policy documents—were assigned to the NMBA by ANMC when ANMAC was appointed as the national accreditation authority.

During the last nine months, ANMAC has comprehensively reviewed, revised and submitted the Registered Nurse Accreditations Standards to the NMBA for approval, following extensive consultation with stakeholders. All other accreditation standards will be reviewed over time to ensure they are contemporary, consistent and aligned with Australian and international best practice. As with the Registered Nurse Accreditations Standards, extensive stakeholder consultations will be held to ensure that other accreditation standards reflect consensus wherever this is consistent with the evidence. Several other sets of accreditation standards are to be developed, including for:

- internationally qualified nurses and midwives seeking entry onto the register in Australia
- remote and isolated practice nurses (or as identified after the relevant registration standard is reviewed)
- professional practice review programs for eligible midwives
- eligible midwives for prescribing scheduled medicines.
ANMAC REPORT ON ACCREDITATION FUNCTIONS TO THE NURSING AND MIDWIFERY BOARD OF AUSTRALIA

Domain 1 Governance

The accreditation authority effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role.

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<td>CONSTITUTION</td>
<td>ANMAC’s inaugural Constitution was amended at the Annual General Meeting held in November 2010 to allow for changes to be made to the composition of the Board to optimise expert and community input. One additional educational expert from the higher education sector and one additional community member are now on the Board. The Board endorsed the revised Constitution on 16 November 2010. These were the last changes to the Constitution. ANAMC is a registered public company limited by guarantee starting 26 May 2010.</td>
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| GOVERNING BODY—MEMBERSHIP, SELECTION PROCESSES, ARRANGEMENTS | The Constitution identifies ANMAC’s member organisations as:  
1. Council of Deans of Nursing and Midwifery (Australia and New Zealand)  
2. Royal College of Nursing Australia  
3. Australian Nursing Federation  
4. Australian College of Midwives  
5. Congress of Aboriginal and Torres Strait Islander Nurses.  
Each member organisation nominates a person to sit as a Director of ANMAC. Other ANMAC directors are:  
- 1 nominee from the vocational education and training sector  
- 1 nominee from the Australian Government  
- 1 nominee from the health ministry in each state and territory  
- 4 representatives from the community  
- 1 education expert from the education sector.  
Community directors are selected after public advertisement and interview. Nominees of the jurisdictions and vocational and education sectors were nominated by the key stakeholder in each instance. The education expert was selected for a unique |

ANMAC Submission to the NMBA for the Review of the Arrangements for the Exercise of Accreditation Functions under the Health Practitioner Regulation National Law Act 10
## MEASURE

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<td>A combination of skills, knowledge and experience as a Dean of Education as well as experience with the nursing and midwifery regulatory processes in another country. Terms of reference for all Board committees were prepared before each committee started. In some cases these have been revised by the Board. The terms of reference and membership of these committees at 30 June 2011 is outlined in the ANMAC Annual Report 2010–11 (<a href="http://www.anmac.org.au">www.anmac.org.au</a>). The Board and Board Committee Policy and Code of Conduct, developed in 2010 and revised in 2012, covers the advertising, selection process, payment, committee procedures, terms of appointment, quorum, and evaluation of the Board and its committees.</td>
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## STAKEHOLDER INPUT IN TO GOVERNANCE ARRANGEMENTS

Stakeholder consultation remains a high priority for ANMAC. Changes to the Constitution in November 2010 strengthened the input of community stakeholders and the Board’s committee membership continues to reflect ANMAC’s strategy to maximise robust community and expert input into its governance decisions.

A formal stakeholder consultation strategy will be developed. In the meantime, ANMAC uses its stakeholder consultation model to seek regular input into its governance arrangements from a wide range of groups—community, education sector, federal, state and territory levels of government, as well as peak bodies in the nursing and midwifery professions.

The Board now comprises:

- 5 representatives nominated from each member organisation (‘Governing body’ above)
- 1 person nominated from the vocation education and training sector (TAFE Directors)
- 2 persons nominated on the advice of the Australian Health Workforce Ministerial Council, one providing an Australian Government perspective and one a state and territory perspective
- 1 educational specialist
- 4 community members not registered as a nurse or midwife.

ANMAC staff, Board members and Board committee members also consult with stakeholders through ANMAC’s representation on a number of government and stakeholder standing committees, industry reference groups, working parties, consultation forums, conferences, seminars and ad hoc meetings.

A major stakeholder consultation achievement was the work completed on the comprehensive review and revision of the Registered Nurse Accreditation Standards (presented to the NMBA for approval 30 June 2012, as scheduled). This involved extensive public consultation with stakeholders over approximately nine months. Participant feedback indicated that the consultation was robust and conducted with integrity.
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<td>ANMAC also seeks the input of experienced and qualified nurses and midwives working in the education sector and health and aged care sectors by inviting members to nominate to participate on the independent assessment teams that assess education providers and their submissions for accreditation of a program of study.</td>
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<td>ACCOUNTS MEET RELEVANT AUSTRALIAN ACCOUNTING AND FINANCIAL REPORTING STANDARDS</td>
<td>The auditors approved the accounts for 2010–11, as published in ANMAC’s annual report for that financial year (<a href="http://www.anmac.org.au">www.anmac.org.au</a>). ANMAC is finalising its 2011–12 financial statements and will submit these to the NMBA in its annual report for that financial year.</td>
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| WORK PLANNED OR UNDERWAY | In its first two years, ANMAC has focused on becoming a leading and reputable accreditation authority. It has built a strong foundation through strategic planning, by building a strong staff complement, establishing well-thought through governance systems and controls, developing and implementing a suite of strategic and operational plans, and establishing strong relationships with ANMAC, NMBA, Australian Health Practitioner Regulation Authority (AHPRA) and other key stakeholders. Specific work underway:  
  • ANMAC is preparing to recruit a for stakeholder relationships management and education position with recruitment starting by mid-September.  
  • ANMAC’s Board is developing and reviewing two important and comprehensive policies:  
    o ANMAC Board and Board Committee Policy and Code of Conduct —already reviewed with declarations to be signed by end October 2012.  
    o ANMAC Monitoring Policy—to be completed by end 2012 for introduction in 2013.  
  • ANMAC’s Board held a two-day strategic planning meeting on 14 and 15 August 2012 to review current arrangements and prepare a strategic plan for the coming triennium.  
  • ANMAC is renegotiating its 2010–12 Employment Based Agreement with staff.  
  • ANMAC’s Board and Finance, Audit and Business Committee review a dashboard for the risk management plan at each meeting.  
  • ANMAC’s Board and Finance, Audit and Business Committee continue to conduct an annual review of the Business Continuity Plan.  
  • ANMAC has assessed its human resources and information management structures and systems and is making improvements to ensure these are operating efficiently and with integrity for the long term.  
Specific work planned:  
  • A formal stakeholder consultation strategy is to be developed. This will be an early priority for the successful recruit of the |
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<td>stakeholder relationships management and education position.</td>
<td>• Following NMBA approval of the revised Registered Nurse Accreditation Standards, ANMAC will use its stakeholder consultation model to:</td>
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<td>o develop additional accreditation standards required</td>
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<td>o review approved accreditation standards for continued relevance.</td>
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Domain 2  Independence

The accreditation authority carries out its accreditation operations independently.

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| DECISION MAKING PROCESSES ARE INDEPENDENT | Being able to carry out its accreditation operations independently is critical to ANMAC’s performance and reputation as an accreditation authority. Consequently, ANMAC has in place structures and processes that specifically contribute to the independence and rigour of its decisions on the assessment and accreditation of programs of study. Processes include a hierarchy of four accreditation committees, a formalised assessment process, an accreditation governance structure, risk management planning and a staff Delegations of Authority Policy. ANMAC’s accreditation governance structure incorporates a number of important checks used to validate assessment outcomes and ensure no material conflict of interest exists. A diagram of this structure is on page 24 of the ANMAC Annual Report 2010–11 (www.anmac.org.au).

1. Assessment: An Accreditation Manager is assigned to review programs of study using the ‘cab-rank rule’. The Accreditation Manager must declare real and potential conflicts of interest that could affect the independence of their opinions. Appropriately qualified accreditation assessment teams are selected and education providers can review proposed team membership and refuse nominees if concerned about their independence. Team members must also declare real or potential conflict of interest in relation to the education provider that may preclude their nomination. The Accreditation Manager, in collaboration with members of the assessment team, prepares a comprehensive report after reviewing the evidence provided and conducting an on-site assessment. Team members and the education provider review the report before it is submitted to the relevant Accreditation Committee. Assessment processes are founded on ongoing discussion between the assessment team and education provider. Every effort is made to solve irreconcilable differences that arise between parties, including if the education provider is not satisfied with the substantive outcomes outlined in the report. In this case, the education provider may seek an independent review of the report before it is submitted to the Accreditation Committee and then to ANMAC’s Board.

2. Review of processes and assessment outcomes: The Accreditation Committee is a group of technical experts recruited by ANMAC for their specific skills, knowledge and experience in the education and practice areas. There are four committees:

- Registered Nurse Accreditation Committee
- Midwifery Accreditation Committee (also reviews programs for eligible midwives)
- Nurse Practitioner Accreditation Committee
- Enrolled Nurse Accreditation Committee.

The committees meet and undertake independent reviews of the assessment process and evidence obtained by assessment teams to meet accreditation standards. An Accreditation Committee can ask for more information from an assessment team...
and/or education provider or make a recommendation to ANMAC’s Board for its determination. Accreditation Committee members must declare real or potential conflicts of interest and absent themselves if the conflict could affect their capacity to provide an independent opinion.

3. Accreditation decision: ANMAC’s Board reviews accreditation recommendations as they arise (to reduce delay) and either approves or requests more information. Board directors are required to absent themselves if they have a real or perceived conflict of interest.

ANMAC’s Risk Management Dashboard is produced from the two-monthly review of the Risk Management Report. It identifies risks to the successful conduct of accreditation and other functions, determines the level of each risk (low, medium or high) and reports on the status of each. The Board reviews the dashboard report at every meeting and revises ratings and/or develops new mitigation strategies. The dashboard identifies ‘lack of consistency of decision-making of assessment teams’ as a high risk and outlines mitigation strategies, including the robust review by accreditation committees with their consistent membership of technical experts.

ANMAC annually reviews its Delegations of Authority Policy.

Privacy and confidentiality requirements for ANMAC staff are clearly outlined in the Enterprise Bargaining Agreement.

PROCEDURES FOR IDENTIFYING AND MANAGING CONFLICTS OF INTEREST.

NOTE this relates to interest of the governing body. if different processes exist for managing assessment team interest, report under Domain 5.

Section 17 of ANMAC’s Constitution—Conflicts of Interest and Disclosure of Interest by Directors—prescribes the responsibilities of directors to declare conflicts of interest and the process for disqualifying a director from being present and/or voting.

Board directors and Board committee members must declare real and potential conflicts of interest in writing at the start of every meeting. The Chair verbally conveys this information to meeting participants and a decision is taken on whether the conflict declared is material. If so, Constitution rules are observed.

One-off and standing interests are recorded in a Register of Interests kept by ANMAC.

Accreditation managers and assessment team nominees must declare real and potential conflicts of interest before being allocated to an assessment team.

ANMAC has in place a Code of Conduct for staff, supported by policies and procedures. The Enterprise Bargaining Agreement articulates that staff are not to publicly disclose to any third party information relating to ANMAC’s affairs or those of related clients or suppliers.

WORK PLANNED OR UNDERWAY

Specific work underway:

• A new policy is being introduced (with declarations to be completed by the end of October 2012) requiring Board directors and committee members to sign a Declaration against the Code of Conduct to ensure their conduct is legal and ethical and that they fully understand these responsibilities:
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|  | o notification, documentation and management of real and perceived conflicts of interest  
|  | o confidentiality of matters raised during Board and Board committee business  
|  | o appropriate recognition and dealings with the intellectual property of ANMAC, education providers, contractors, stakeholders and others.  
|  | • An independent annual financial audit is conducted by ANMAC-appointed external auditors each year.  
|  | • The Assessor’s Handbook is being revised to strengthen requirements around declaration of conflicts of interest, confidentiality and privacy of information and documentation, as well as the intellectual property rights of education providers seeking accreditation.  
|  | **Specific work planned:**  
|  | • An audit on policies, processes and compliance by ANMAC-appointed external auditors will take place annually starting in 2012–13. |
## Domain 3  Operational management

The accreditation authority effectively manages its resources to support its accreditation function under the National Law.

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| **RESOURCES TO ACHIEVE ACCREDITATION FUNCTION OBJECTIVES** | **ANMAC’s annual report is approved by its Board and published on its website ([www.anmac.org.au](http://www.anmac.org.au)). The ANMAC Annual Report 2010–11 describes the financial and other resources available to ANMAC to achieve its accreditation function objectives. The next annual report will be posted on ANMAC’s website in October 2012.**  
**ANMAC’s high-level organisational structure and numbers of staff (full-time equivalent) have been adjusted to meet its changing responsibilities and increase in workload. ANMAC is increasing the number of staff in Accreditation Services to meet the large number of accreditation applications, many of which related to the moratorium.**  
Three new accreditation managers have recently been appointed and recruitment of others is underway. Selection of an assessment team coordinator is in the final stages.  
A stakeholder relationships management and education officer is to be appointed in the near future to assist with the very important role of assisting ANMAC to communicate consistently and regularly with all key stakeholders, such as education providers.  
An accreditation standards development and review officer is also being recruited to manage projects for the review and development of the accreditation standards, another function delegated to ANMAC under the National Law.  
The establishment of a monitoring and assurance unit to discretely manage ANMAC’s monitoring function and the recruitment and selection of staff is being planned to relieve the burden from the team undertaking accreditation. Complaints and the other monitoring functions are being managed by the existing assessment team.  
Induction, mentoring and supporting new staff is a high priority and ANMAC has invested appropriately in this.  
The introduction of a comprehensive integrated database (NetSuite) from July 2012 and a new document management system (SharePoint) introduced in June 2012 are key resources designed to assist ANMAC to work ‘smarter’ in all areas; but particularly to support the accreditation functions.  
The introduction of payments for ANMAC assessors occurred from 1 July 2012. This will no doubt encourage more assessors from the education sector and health and aged care service sector to participate, especially by those who previously found it difficult to be released from their employment to perform such duties. This will, in turn, broaden ANMAC’s pool of assessors and lesson the burden of those currently on the assessor registry. |

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4 When ANMAC started its role as an independent accrediting authority, the NMBA determined that programs requiring accreditation between 1 July 2012 and 20 June 2012 would be granted an extension of up to two years to give ANMAC sufficient time to establish the policies and procedures required to acquit its responsibilities. During this transition period, ANMAC still received nearly 150 submissions for accreditation to process.
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<tr>
<td><strong>MONITORING AND IMPROVING ACCREDITATION PROCESSES, AND RISK MANAGEMENT</strong></td>
<td>A key principle of the National Accreditation Framework is quality improvement and risk management. ANMAC has developed a risk management plan that is reviewed regularly with updates reported at each Board meeting. Accreditation committees have a standing agenda item at each meeting to consider aspects of the accreditation policy and processes that may require improvement. Evaluation of each accreditation assessment is conducted and feedback sought from education providers, members of assessment teams and ANMAC accreditation managers to identify needed improvements. Workshops for accreditation managers are held over several days every two to three months to review accreditation policy, procedures, resources and instruments. ANMAC’s new Monitoring Policy is a key element of its risk management scheme and will identify accredited programs and providers through a suite of risk indicators that will trigger a monitoring response from ANMAC. Recent database (NetSuite) and information management system developments are improving ANMAC’s capacity to monitor and manage all aspects of accreditation assessment, applications for modifications to accreditation, monitoring and all aspects of reporting.</td>
</tr>
<tr>
<td><strong>INFORMATION AND RECORDS, INCLUDING CONFIDENTIALITY</strong></td>
<td>ANMAC is reviewing its policy on electronic and paper records (creating, accessing, managing, storing, archiving and destroying) and over a 12-month period are introducing new information management systems and a fully integrated database—SharePoint and NetSuite. These will make ANMAC operations more efficient through systematic processes and transaction flows, a wide range of reporting mechanisms and integrated payroll, financial management and human resources information. Current systems will be converted to NetSuite by October 2012. ANMAC’s new SharePoint is a secure information management system that helps manage risks associated with access to documentation and tracking access by users. Security categories have been designated and only staff with log-in authority can access files. An Extranet is being developed to provide ANMAC Board members, Board committees and assessment team members with easy and secure access to shared information for business purposes. ANMAC expects this to be fully operational by the end of 2012. The Employment Based Agreement requires staff to not disclose ANMAC’s affairs or business to third parties. This requirement is also in staff policies on confidentiality, intellectual property, IT security and copyright.</td>
</tr>
<tr>
<td><strong>FEE CHARGING BALANCES NATIONAL LAW AND BUSINESS REQUIREMENTS</strong></td>
<td>ANMAC’s Board set application fees for full accreditation and major changes after analysing component costs and fees charged by other health professional accreditation authorities—public and private sector. ANMAC intends to make the accreditation function</td>
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<td>as self-funding as possible once demand has stabilised and start-up costs defrayed. The Board recognises that ongoing monitoring, reviewing policy development and reviewing accreditation standards will need external funding for some time. ANMAC’s fee schedule was initially reviewed through careful assessment of current practices across accreditation authorities. It will be reviewed in readiness for 2013–14. A project commissioned to benchmark fee policy and fees will help ANMAC prepare for the next review. Particular focus will be on fees charged for assessing modifications of currently accredited programs which have not always been identified to ANMAC. Education providers can access the fee schedule on ANMAC’s website (<a href="http://www.anmac.org.au">www.anmac.org.au</a>).</td>
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</table>

| WORK PLANNED OR UNDERWAY | A large body of work is planned or underway to ensure the efficient use of ANMAC resources:  
**Specific work underway:**  
- Review of human resources function, including position descriptions, policies and procedures and the development of a comprehensive human resources manual—due for completion end 2012.  
- Review of work health and safety (WH&S) functions, including establishing a new WH&S group and risk assessment program, reviewing WH&S policies and procedures, as well as developing a WH&S manual—due for completion end 2012.  
- Install NetSuite, a fully integrated database including financial management, payroll, human resources, accreditation and other operational functions—Stage 1 due for completion end November 2012.  
- Finalise implementation of SharePoint, a web-based business collaboration platform, including a new secure documents management system that will make it easier and quicker for staff to work together—in final stages of introduction.  
- Implement the Monitoring Policy—over coming 12 months.  
- Recruit more staff to meet obligations under National Law including:  
  - Assessment Team Coordinator  
  - Accreditation managers  
  - Standards development and review coordinator  
  - Stakeholder relationships management and education position  
  - Monitoring and assurance officer.  
**Specific work planned:**  
- Establish a monitoring and assurance service to discretely manage ANMAC’s monitoring function.  
- Review the policy on creating, accessing, managing, storing, archiving and destroying electronic and paper records. |
## Domain 4  
**Accreditation standards**

The accreditation authority develops robust accreditation standards which have been set in advance for the assessment of programs of study and education providers.

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| **ACCREDITATION STANDARDS FOR PROGRAMS OF STUDY FOR GENERAL REGISTRATION, SPECIALIST REGISTRATION AND/OR ENDORSEMENT** | Currently approved accreditation standards are on ANMAC’s website (www.anmac.org.au). These include:

  - Accreditation standards leading to registration:
    - Entry for registered nurses
    - Entry for midwives
    - Entry for enrolled nurses
    - Re-entry for registered nurses
    - Re-entry for midwives
    - Re-entry for enrolled nurses.

  - Accreditation standards leading to endorsement:
    - Entry for nurse practitioners
    - Interim standards for professional practice review programs for eligible midwives
    - Interim standards for scheduled medicines for eligible midwives.

  - Currently the relevant re-entry standards are being used as accreditation standards for programs for internationally qualified nurses and midwives.

  - ANMAC has revised the Registered Nurse Accreditation Standards approved by the Ministerial Council at the time of the transition to the National Accreditation Scheme following extensive stakeholder consultation and a professional, collaborative approach. The revised standards were submitted to the NMBA for approval on 30 June 2012. A communication strategy is being developed. Dates for introducing these initiatives will be set once the standards are approved.

  - The accreditation standards are also included in the application packs provided to education providers intending to apply for accreditation. These packs are being review to ensure they meet the requirements of AHPRA’s data set for the ‘approved programs of study list’ and ANMAC needs. In the packs, standards are in table form with space for applicants to easily respond to each one. |

**WORK PLANNED OR UNDERWAY**  
*Specific work planned:*
**MEASURE** | **RESPONSE**
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All accreditation standards will be successively reviewed and updated in line with the revised Registered Nurse Accreditation Standards and contemporary evidence and best practice—by the end of 2015. These include accreditation standards for the following programs:

- Entry for midwives—by 30 September 2013
- Re-entry for registered nurses—by 30 September 2013
- Re-entry for midwives—by 31 March 2014
- Entry for enrolled nurses—from October 2013
- Endorsement for nurse practitioners – to follow.

The following accreditation standards will be developed *de novo* or from current interim standards:

- Entry for internationally qualified midwives—by 30 September 2013.
- Entry for internationally qualified registered nurses—by 31 March 2014
- Endorsement of eligible midwives for scheduled medicines—by 30 September 2013
- Eligible midwives professional practice review programs—by 30 September 2013
- Nurses in remote and isolated practice: supply of scheduled medications—by 30 September 2013
- Entry for internationally qualified enrolled nurses—from October 2013.
### Domain 5 Processes for accreditation of programs of study and education providers

The accreditation authority applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers.

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<th>MEASURE</th>
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<tr>
<td><strong>LIST PROGRAMS OF STUDY ACCREDITED</strong></td>
<td>The 64 programs of study accredited by ANMAC from 1 July 2010 to 30 July 2012 are listed on the NMBA website on a list of approved and accredited programs of study. The programs on this list may have been accredited by ANMAC; or previously by the relevant state or territory nursing and midwifery regulatory authority.</td>
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</table>
| **DOCUMENTATION ON STANDARDS AND PROCEDURES FOR ASSESSMENT OF PROGRAMS** | ANMAC’s website is resource rich and designed in part to assist education providers and other stakeholders understand the process of assessment and accreditation. Information posted includes:  
  - Accreditation Assessment Process  
  - Presentation—resources to help education providers prepare submissions  
  - National Accreditation Guidelines  
  - National Accreditation Framework  
  - Accreditation Standards.  
<p>| <strong>POLICIES ON ASSESSMENT TEAM MEMBERS</strong> | The National Accreditation Guidelines, the relevant accreditation standards and the Assessor’s Handbook is a resource for assessment team members and forms part of the National Accreditation Framework. It is under review to update it with payment of assessment team details and strengthened with policy statements on privacy, confidentiality, conflict of interest and intellectual property rights. Work is expected to be complete 30 September 2012. |
| <strong>PROCEDURES FOR IDENTIFYING AND MANAGING CONFLICTS OF INTEREST IN THE WORK OF ACCREDITATION ASSESSMENT TEAMS AND WORKING COMMITTEES.</strong> | See above and responses to Domain 2—Independence where the policy on conflict of interest and declarations to be made is dealt with. |
| <strong>THE AUTHORITY FOLLOWS ITS PROCESSES FOR DECISION-MAKING</strong> | The Flowchart of accreditation decision-making outlines the process for recommending applications for accreditation. ANMAC |</p>
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<td>AND REPORTING</td>
<td>follows this process and it is reflected in the terms of reference of all Board committees. This is outlined on page 24 of the ANMAC Annual Report 2010–11 available on the website <a href="http://www.anmac.org.au">www.anmac.org.au</a>.</td>
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| ACCREDITATION CYCLE INCLUDING MONITORING OF ACCREDITED PROGRAMS OF STUDY | When ANMAC’s Board grants accreditation without condition it is normally for five years. Full accreditation may be less than five years depending on circumstances reasonably foreseen by ANMAC or the education provider, such as professional or workforce issues. ANMAC will use its monitoring powers and Monitoring Policy to place conditions on an accredited program or revoke accreditation if there are serious breaches of requirements during the accreditation period and give the National Board written notice of ANMAC’s decision. Under section 50 of the National Law, ANMAC is required to monitor accredited programs of study approved by the NMBA—currently more than 400 through 160 education providers. A comprehensive monitoring policy is in the final stages of development. Its purpose is to describe how ANMAC monitors the programs it has accredited to ensure ongoing compliance with the standards required under the National Law. Given the large number of education providers and programs of study, the policy is developed around a much-needed risk-based approach. The policy is scheduled for completion by the end of 2012 and will be introduced over the following 12 months, starting with the communication strategy and staff training. The key elements of the Monitoring Policy are:  
  - Annual declaration to be provided by all education providers that accredited programs are being conducted according to ANMAC’s terms and conditions.  
  - Standard mandatory interim reporting requirements and special reporting requirements generally imposed by ANMAC when accreditation is granted or when modifications are made to accredited programs.  
  - Responses to complaints about accredited programs or education providers with accredited programs.  
  - Responses to concerns about accredited education programs and providers that arise in other circumstances (for example, media articles).  
  - Risk-related auditing of programs and providers where risk indicators suggest there may be potential or real areas of concern relating to an education program or provider (for example, conditions imposed on accreditation or multiple or significant single complaints). |  |
| COMPLAINTS, REVIEW AND APPEALS PROCESSES                                 | Review                                                                                                                                                                                                    |  |
|                                                                        | Education providers can review draft reports on assessment outcomes before ANMAC makes accreditation recommendations to its Board. Other review opportunities are available after decisions have been made. After the Board has made an accreditation decision an education provider may ask for it to be reviewed, but only when an assessment team member is alleged to have failed to follow appropriate processes or meet specified standards for decision making |
### MEASURE

and reporting (including basing decisions on accurate and relevant evidence).

**Appeals**

Limited statutory appeals are available under the National Law. However review of administrative decisions and judicial review may be available in certain circumstances. Other appeal opportunities are available after decisions have been made. No appeals have been received to date.

**Complaints**

Management of complaints is a key aspect of ANMAC’s Monitoring Policy, currently under development.

When ANMAC receives information on an accredited education provider or program of study that questions the legitimacy of accreditation (through formal complaint, notification or report), or if ANMAC reasonably believes the education provider or program of study no longer meet accreditation standards, ANMAC, under section 50(2) of the National Law, will investigate the circumstances and identify if material breaches of the accreditation standards have been made. If they have been made, ANMAC will then:

1. impose conditions on the accreditation that it considers necessary to ensure the education provider or program of study will meet the requisite standard(s) within a reasonable time
2. revoke the accreditation
3. give the NMBA written notice of ANMAC’s decision so the NMBA can review it and approve the education provider or program as providing a qualification leading to registration or endorsement.

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<tr>
<th>WORK PLANNED OR UNDERWAY</th>
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<tr>
<td><strong>Specific work underway:</strong></td>
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<tr>
<td>Comprehensive reviews are underway of:</td>
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<tr>
<td>• National Guidelines for the Accreditation of Nursing and Midwifery Courses Leading to Registration and Endorsement in Australia—by 30 September 2012</td>
</tr>
<tr>
<td>• Assessors’ Handbook—by 30 September 2012.</td>
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<tr>
<td>Finalisation of the Monitoring Policy by the end of 2012 and implemented over the following 12 months.</td>
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<tr>
<td><strong>Specific work planned:</strong></td>
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<tr>
<td>• other policies and instruments already outlined</td>
</tr>
<tr>
<td>• other accreditation standards already outlined.</td>
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Domain 8  Stakeholder collaboration

The accreditation authority works to build stakeholder support, and collaborates with other national and international accreditation authorities including other health profession accreditation authorities.

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<th>MEASURE</th>
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<td>STAKEHOLDER ENGAGEMENT</td>
<td>See also Domain 1.</td>
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<td></td>
<td>Effective and proactive two-way communications is one of ANMAC Board’s four strategic directions (outlined during the Board’s strategic planning days in August and currently being written up). The appointment of a specific person to develop the stakeholder engagement strategy and supporting policy will be an important step.</td>
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<td>ANMAC’s communication strategy, finalised in March 2012, outlines the early approach to stakeholder engagement and other communications initiatives and approaches.</td>
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<td></td>
<td>While maintaining its independence, ANMAC will continue to build and improve strategic relationships with three key stakeholders—AHPRA, Health Workforce Australia and NMBA. Ongoing communication with, and meetings held with, NMBA and AHPRA continue.</td>
</tr>
<tr>
<td></td>
<td>Board members, Board committee members and staff represent ANMAC on a number of government and stakeholder standing committees, industry reference groups, working parties, consultation forums, conferences, seminars and ad hoc meetings, including:</td>
</tr>
<tr>
<td></td>
<td>• Health Workforce Australia governance committees and working parties for a number of projects</td>
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<td></td>
<td>• Department of Health and Ageing committees, including for nursing and midwifery, aged care, community care</td>
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<td></td>
<td>• Forum of Australian Health Professions Councils</td>
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<td></td>
<td>• Council of Deans of Nursing and Midwifery</td>
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<td></td>
<td>• Australian College of Midwives</td>
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<td></td>
<td>• Royal College of Nursing Australia</td>
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<td>• Congress of Aboriginal and Torres Strait Islander Nurses</td>
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<td>• Australian Nursing Federation</td>
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<td>• TAFE Directors Australia</td>
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<td></td>
<td>• Council of Chief Nursing Officers in Australia and New Zealand</td>
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<tr>
<td></td>
<td>• International Council of Nurses</td>
</tr>
<tr>
<td></td>
<td>• International Confederation of Midwives</td>
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MEASURE | RESPONSE
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- International English Language Testing System  
- Occupational English Test Centre  
- Migration Institute of Australia  
- Health professional regulatory authorities in other countries.

At the start of operations, ANMAC’s Chief Executive Officer and Director of Accreditation visited each state and territory to meet stakeholders and explain the national accreditation process. Since then, ANMAC directors and staff have seized every opportunity to communicate with stakeholders at conferences, seminars and meetings. The communications strategy includes a detailed stakeholder engagement schedule.

COMMUNICATION STRATEGY

ANMAC’s key communication goal is to raise awareness of ANMAC as a professional, ethical, credible, accessible and independent accreditation authority for the nursing and midwifery professions and as the assessing authority for nurses and midwives who intend to migrate to Australia.

Tools and activities designed around communication ANMAC’s key messages include:
- redevelop ANMAC’s website with a new structure and design to: better fit the needs of user groups; make navigation more intuitive; streamline content presentation; introduce social media links; and enhance search engine optimisation.
- provide regular ANMAC updates and promote ANMAC’s work on the website and in biannual news reports and newsletters
- continue to seize opportunities to talk about ANMAC and issues at relevant nursing and midwifery conferences and forums
- continue to engage with nursing and midwifery and health professional organisations through regular attendance at stakeholder meetings and forums
- continue to raise awareness of ANMAC to education providers through state and territory information seminars
- provide regular reports to stakeholders (through the Extranet as appropriate and through formal mechanisms such as the annual report)
- engage with relevant government agencies and key nursing and midwifery personnel.


COLLABORATION WITH OTHER NATIONAL AND INTERNATIONAL

ANMAC is a member of:
- [Forum of Australian Health Professions Councils](http://www.anmac.org.au)—the coalition of the accreditation councils of the regulated health professions.
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<th>MEASURE</th>
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<tr>
<td>ACCREDITATION AUTHORITIES</td>
<td>professions, each being the appointed accreditation authority for the profession National Board under the National Law.</td>
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<tr>
<td></td>
<td>•  Professions Australia—a national organisation of professional associations</td>
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<td>•  Associations Forum—designed to bring association together to boost performance.</td>
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<td>In addition, ANMAC is continuing to build strong and meaningful relationships with:</td>
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<tr>
<td></td>
<td>•  Tertiary Education Quality and Standards Agency—preliminary discussions underway</td>
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<tr>
<td></td>
<td>•  Australian Skills Quality Authority—memorandum of understanding signed</td>
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<tr>
<td></td>
<td>•  Nursing Council of New Zealand</td>
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<td></td>
<td>•  Midwifery Council of New Zealand</td>
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<tr>
<td></td>
<td>•  International Council of Nurses</td>
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<tr>
<td></td>
<td>•  International Confederation of Midwives</td>
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<tr>
<td></td>
<td>•  other international nursing and midwifery regulatory authorities with accreditation responsibilities.</td>
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<tr>
<td>WORKING WITHIN NATIONAL AND INTERNATIONAL STRUCTURES OF</td>
<td>Planning to seek accreditation from appropriate international quality certification agency once the start-up phase is complete and</td>
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<tr>
<td>QUALITY ASSURANCE/ACCREDITATION</td>
<td>ANMAC’s governance and operational systems are more developed and embedded in day-to-day business.</td>
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<tr>
<td>WORK PLANNED OR UNDERWAY</td>
<td>Specific work underway:</td>
</tr>
<tr>
<td></td>
<td>•  hold regular meetings with NMBA, AHPRA and Health Workforce Australia</td>
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<td></td>
<td>•  redevelop website—scheduled to be complete by the end of 2012</td>
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<tr>
<td></td>
<td>•  recruit a stakeholder relationship management and education coordinator</td>
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<td>•  regularly deliver ANMAC information seminars throughout Australia, to be scaled up once stakeholder relationship management and</td>
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<td>education coordinator has been appointed</td>
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<td>•  develop and sign a memorandum of understanding with the Nursing Council of New Zealand</td>
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<td>MEASURE</td>
<td>RESPONSE</td>
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<tr>
<td>review and update a memorandum of understanding with the Australian Skills Quality Authority</td>
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<tr>
<td>Specific work planned:</td>
<td>- develop standard formats and templates for ANMAC communiqués, news report, newsletter and other official documents</td>
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<tr>
<td></td>
<td>- establish memorandum of understanding with the Midwifery Council of New Zealand</td>
</tr>
<tr>
<td></td>
<td>- establish collaborative approach and memorandum of understanding with the Tertiary Education Quality and Standards Agency.</td>
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