

The Executive Officer
Nursing and Midwifery Board of Australia
GPO Box 9958
Melbourne VIC 3001
Via email to: nmbafeedback@ahpra.gov.au

Dear Nursing and Midwifery Board of Australia

The Australian Private Hospitals Association (APHA) is appreciative of the opportunity provided to comment on the proposed changes to the decision-making framework for nurses and midwives.

The private hospital sector is responsible for about 40% of all hospitalisations in Australia, and in 2016-17, the private sector employed more than 38,000 full-time equivalent nursing staff. The decision-making framework is an important tool in supporting nurses and midwives in their practice.

Overall, APHA supports the proposed new version as more contemporary and simple to use. The new version relates to current standards and emphasises organisational responsibilities as well as the individual.

Some of the language used in the nurses flow chart needs further clarification:

- Under the heading “Reflect on scope...”, point 3:
the words ‘*does the person have it*’ should be replaced with ‘has this been granted’
- Under the heading “Consider the Context...”, point 3:
the words ‘*does the person have it*’ should be replaced as above.
- Under the heading “Consider the Context...”, the final point:
‘are their processes in place for maintaining performance into the future’ needs to be expanded to ask ‘are there processes in place to provide education, supervision, and support in developing and maintaining proficiency into the future?’
- In the ‘No to any’ box, 4th point:
‘gaining qualifications’ should be expanded to include ‘seek further training, knowledge and skills’.

Thank you again for the opportunity to review the proposed changes,

Regards,

Lucy Cheetham
ACTING CHIEF EXECUTIVE OFFICER
28 June 2019