

## **NENAC feedback on HumanAbility's Workforce Report – May 2023**

Thank you for the opportunity to provide feedback on [HumanAbility's](#) workforce analysis on the sectors it supports. The [National Enrolled Nursing Advisory Council \(NENAC\)](#) represents all Australian TAFEs delivering the Diploma of Nursing qualification. According to the latest NCVER data<sup>1</sup>, two thirds of the 25,675 enrolments in the Diploma of Nursing are at TAFE institutes.

NENAC would like to highlight the following areas for the Workforce report and for future consideration in HumanAbility's workforce planning for Enrolled Nurses (EN) and the healthcare sector more broadly.

### **Better recognition and utilisation of Enrolled Nurses in the aged care workforce**

NENAC members are concerned about the mandated care minutes requirements in residential aged care settings that do not fully recognise the EN scope of practice nor identify a specific role for ENs. From 1 October 2023, residents must have a minimum of 40 minutes per day with a Registered Nurse (RN) while the balance (160 minutes) of the mandatory 200 minutes per resident, per day can be provided by a RN, EN or a personal care worker (PCW). Minutes of care provided by ENs cannot be counted towards RN specific care minutes.

The unintended consequences of this are that aged care providers in some jurisdictions who currently employ ENs will not be employing them in future. In practice (and this has already started to occur), aged care facilities will now only employ PCWs to meet the remaining 160 minutes. The evidence of this is being felt in 2023 as employers are also starting to decline Diploma of Nursing students for their mandatory work placements as they do not envision them in their future workforce.

Aged care providers, unions, and ENs themselves have expressed concern that they do not seem to be part of the mandated equation in the nursing hours for aged care. Furthermore, providers are concerned that with existing and ongoing staff shortages, especially with RNs, they will not be able to meet the significant increase in mandated nursing hours without ENs.

As the HumanAbility report notes *"approximately 30% of enrolled nurses work in residential aged care facilities. This number represents the second most common place of employment after public and private hospitals (where 54% of enrolled nurses work)"*. NENAC is keen to ensure that ENs continue to be recognised and utilised as an integral part of the aged care workforce and an important contributor to quality outcomes for aged care residents. NENAC encourages HumanAbility to acknowledge the potential impact of the mandated care minutes in the aged care workforce on ENs in its report.

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<sup>1</sup> <https://www.ncver.edu.au/research-and-statistics/collections/students-and-courses-collection/total-vet-students-and-courses>

## **Pathways, access and equity: identifying, articulating and promoting career pathways within the health workforce**

The HumanAbility report notes that *"Building more effective transparent pathways into the Diploma from Certificate III and IV qualified allied roles remains a challenge that should be addressed"* (p69).

NENAC agrees that the Diploma of Nursing qualification is important within the context of the health workforce because of its positioning between lower AQF-level courses such as the Certificate III in Individual Support or Health Services Assistance and the higher degree-level Bachelor of Nursing qualification. There are both pathways into and out of the Diploma of Nursing qualification which warrant further exploration in the context of quality skills development for the health and human services workforce.

Pathways are also important in the context of access and equity and for increasing participation of specific cohorts such as First Nations students in the healthcare and nursing workforce. NENAC notes the broader, complex picture of reform efforts which are seeking to better align VET and higher education and promote seamless pathways between all levels of the AQF. As part of its workforce planning and in the context of addressing skills shortages, NENAC encourages HumanAbility to:

- identify, articulate and promote pathways to student cohorts e.g. so students know what career paths are possible, that they can work/earn money while they learn, help young people and those seeking a career change to envisage and aspire to a career pathway in the health and human services sector
- explore benefits of an intra-professional education model or framework e.g. individual support, enrolled nursing and bachelor of nursing students learning about each other's scope of practice. This can inspire students into other pathways – but this requires an appropriate education framework
- explore the "leap" required from a Certificate III to a Diploma and on to a Bachelor level qualification (noting the changes in the teaching and learning methodologies between the different levels) and whether further support is needed in this space
- develop a common view on where the diploma (and advanced diploma) sits in the higher education landscape and whether common core units and skills could be identified for the purposes of students gaining credit for their Diploma at the university level

## **Holistic and culturally safe training and education for the healthcare workforce to achieve optimal health and wellbeing for Aboriginal and Torres Strait Islander Peoples**

In the context of the nursing workforce, HumanAbility may want to consider the inclusion of the Congress of Aboriginal and Torres Strait Islander Nurses and Midwives (CATSINaM) as one of the Aboriginal and Torres Strait Islander policy reforms/strategic plans listed on page 31, specifically its report on [Strategies for Aboriginal and Torres Strait Islander Nursing and Midwifery Education Reform \(GENKE II\)](#).

NENAC understands that CATSINaM rightfully sought to embed cultural safety and awareness in the delivery of the current Diploma of Nursing training package. However, the prescriptive nature of the training package system with its discrete units of competency has complicated the intent. In consultation with CATSINaM, NENAC is keen to ensure that all Diploma of Nursing students have appropriate knowledge and experience to deliver holistic and culturally safe care to Aboriginal and Torres Strait Islander people.

NENAC would like to explore alternative approaches in consultation with HumanAbility and CATSINaM on how best to deliver cultural safety and awareness training to Diploma of Nursing students. This approach could of course be applicable to other qualifications within the healthcare and early childhood space.

### **Qualification reform and making the workplace experience and assessments meaningful to produce job-ready graduates**

Since its establishment, NENAC has advocated strongly for qualification reform to ensure that the Diploma of Nursing is fit for purpose and reflects the contemporary requirements of industry. NENAC is committed to ensuring that qualifications are future focussed and are preparing graduates to work in the rapidly changing health care environment, including planetary health.

Feedback from NENAC's industry partners has consistently been that Diploma of Nursing graduates are too task-oriented and skill focused. Nursing as a profession requires enrolled nurses to have a holistic approach to their activities and person-centred care. This is very difficult to structure with the overwhelming number of assessment requirements within the current training package that are required to be undertaken on work placement (approximately 38 pieces of assessment).

There are also issues with the way in which the 400 hours of work placement are spread across several units of competency which further complicate delivery for students and funding mechanisms for RTOs. NENAC encourages HumanAbility to explore an approach which would see the 400 hours allocated to one unit of competency (the work placement). The focus of the work placement would be on meeting the Nursing Midwifery Board of Australia (NMBA) Enrolled Nursing Standards for Practice and on holistic person-centred care rather than on assessing specific skills and tasks, which can and are already assessed in simulation. NENAC also encourages HumanAbility to examine the role and use of simulation in teaching, honing, and assessing skills.

NENAC acknowledges the scale of the challenges ahead for HumanAbility in terms of workforce planning and addressing the skills shortages in the sectors that HumanAbility represents. We hope that these suggestions are useful to inform your future thinking and look forward to ongoing collaboration with HumanAbility.

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