

Australian Government Department of Education, Skills and Employment

By email: Hereform@dese.gov.au

To whom it may concern

Feedback on the exposure draft for Higher Education Support Amendment (Job-ready Graduates and Supporting Regional and Remote Students) Bill 2020

The Australian College of Nursing (ACN) would like to thank the Australian Government Department of Education, Skills and Employment for the opportunity to provide feedback on the exposure draft for Higher Education Support Amendment (Job-ready Graduates and Supporting Regional and Remote Students) Bill 2020 (the Bill).

ACN promoted this consultation opportunity to our Fellows and members who have an interest in this area for their input to ACN's response. ACN's feedback on the Bill is provided below.

Overall, ACN members welcomed the focus on how to assist young Australians to prepare for their futures, including incentivising nursing education, and ACN is broadly supportive of encouraging more people to enrol in nursing courses. However, there are a number of points ACN would like to make in relation to the Bill and the issues raised in the 'Job-ready Graduates: Higher Education Reform Package 2020' discussion paper (the discussion paper).

ACN welcomes the news that nursing students studying at universities can expect to pay 46% less in fees in the future, resulting in an average annual tuition fee of \$3,700. Nursing is one of the top three professions in demand in the future¹ and this will encourage more people to pursue a nursing degree.

However, ACN is calling for the Australian Government to work with state and territory governments, health departments and employers to routinely collect data in enough detail in areas such as nursing numbers, job titles, scope of work, place of employment, working arrangements and hours, age, educational attainment and nurses' future employment intentions. This data would then need to be used for modelling purposes to form a comprehensive national workforce strategy. At the moment, due to incomplete and inconsistent data on nursing numbers, positions, workforce characteristics etc there is insufficient data available to know how many nurses are needed in the future, in which speciality areas of nursing, and in which geographic areas.

ACN does not want to see an oversupply of nurses where graduates cannot gain employment in nursing but were under the assumption or were told at the start of their degree or before they commenced that nursing career prospects were optimistic for all graduates. Governments need to support newly graduated nurses to access graduate programs which are beneficial in the development and training of new nurses. Graduate programs lay a good foundational framework for new nurses and set them up well professionally in their careers. The Victorian Government Department of Health and Human Services in its Nurse and midwife new graduate guide, on page seven, identifies that 'Nursing and midwifery are practice-based professions, so it's important that you consolidate your undergraduate learning through regular employment in the first year of being

¹ Australian Government National Skills Commission, n.d., Job Outlook, Future Outlook, https://joboutlook.gov.au/future-outlook.aspx





registered'². Governments should fund graduate programs for the benefit of nurses and people accessing health services. Graduate programs are not available in aged care and primary health care settings which discourages graduate nurses into these fields. Funding for graduate programs in these two sectors should be a government priority.

ACN members do not support the 113% increase in fees for humanities degrees including subject areas like social sciences and creative arts which tie in to nursing education and values. Increasing Commonwealth Supported Places (CSP) by approximately 14% to an extra 39,000 is welcome but it should not come at the expense of other subject areas, namely humanities, society & culture, behavioural sciences, amongst other disciplines. These disciplines require students to think critically, communicate effectively, problem solve, synthesise and analyse complex information in a succinct manner, and they shape cultural and societal thinking and attitudes on many issues.

Nursing is positively influenced by these disciplines and incorporates the skills developed in these areas into its teaching and practice delivery methods. Nursing is an evidence-based profession blending science and humanities. The Nursing and Midwifery Board of Australia points out in the *Registered nurses standards for practice* on page two, that:

'The Australian community has a rich mixture of cultural and linguistic diversity, and the *Registered nurse standards for practice* are to be read in this context. RNs recognise the importance of history and culture to health and wellbeing. This practice reflects particular understanding of the impact of colonisation on the cultural, social and spiritual lives of Aboriginal and Torres Strait Islander peoples, which has contributed to significant health inequity in Australia'³.

Nurses develop skills in understanding how people and society function and the factors that impact many socio-political issues that affect patients, health care consumers and residents in long-term care whom clinically-practicing nurses work with every day by studying nursing and humanities subjects.

ACN members made specific comments further to this matter, including:

- to tie loan eligibility to academic performance ignores the reality of genuine education
- the education a person has access to should not be determined by how much money they have or how much debt they are willing to accept
- the reduction in funding of the Arts and studies within Arts degrees ignores the value of these areas which sustain society and make us a much more caring and sensitive world at a time when we need a more humane and aware society
- a community that is intellectually and professionally diverse is more likely to be able to adapt to changing and complex needs. There is a risk that graduates may be pigeon-holed into delineated careers. Developing transferable skills like critical thinking and problem solving, even if not tied to a specific industry or leading to a specific career, should not be discounted.

ACN members are concerned about the inadequate level of funding for nursing education overall. The total funding for nursing degrees is being reduced by 8%. The students will pay less but the

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² Victorian Government Department of Health and Human Services May 2020, *Nurse and midwife new graduate guide*, https://www2.health.vic.gov.au/health-workforce/nursing-and-midwifery-graduates

³ Nursing and Midwifery Board of Australia 2016, *Registered nurses standard for practice*, https://www.nursingmidwiferyboard.gov.au/documents/default.aspx?record=WD16%2f19524&dbid=AP&chksum=R5Pkrn8yVpb9bJvtpTRe8w%3d%3d





government contribution does not match the shortfall that is created by the reduction in student contribution. If more people enrol in nursing courses, universities need to be adequately funded to teach more students. The students will still need to meet all of the Nursing and Midwifery Board of Australia standards for practice and adhere to the code of conduct. However, it is not clear whether university professors and teaching academics will have the resources and support made available to them to ensure graduates are graduating at the required and expected level of competence, knowledge and skill combined with the necessary practical experience. ACN obtained feedback from a Professor of Nursing who has worked in this capacity at three universities who articulated the message below:

"At no time were we adequately funded for clinical and theory which was required to produce effective and efficient registered nurses. Also, our original funding did not ever include an amount for research which has meant that nurses are restricted in the amount and quality of research they can undertake. Our graduates are doing higher research degrees at the same time they are working shifts in acute hospital settings. And being mainly women, this is once more disadvantageous for women."

Strong research infrastructure needs to be in place to support universities to engage students in nursing research. It is nursing research that finds solutions to issues which benefit patient care and foster improvements in nursing. It is already difficult for nurses to obtain funding for research projects. Any changes need to make it easier for nurses to secure funding, not make it more difficult.

The extra 39,000 university places for Australian students, to be funded by 2023, results in only a relatively small number of extra CSP students per university divided amongst the 43 universities in Australia (40 Australian universities, two international universities, and one private specialty university) as well as the other institutions offering higher education courses, such as ACN. It is not clear how many nursing students specifically will be offered a CSP and whether this is every year between now and 2023 or not. A Bachelor of Nursing is a three-year degree and the Bill and discussion paper imply that the increase in CSP students is directed at future undergraduate students.

The costs of simulation and clinical practicum is significant with the costs of practicum increasing each year. The reduction in overall funding has the potential to have a detrimental effect on delivery that seems to be counter to the Australian Government's position of graduates being more employable. There needs to be additional funding to make employers/organisations 'work responsive' to new graduates who are transitioning from the education sector to professional practice, as was articulated to ACN by our members. 'Transition to Practice' programs are a successful way to support graduate nurses with the necessary career and work guidance as they transition into employment. ACN argues that education providers, particularly ACN, already have strong ties and productive working relationships with industry partners to ensure students are obtaining the required clinical placement hours.

ACN members questioned the fairness in relation to 25 Subclause 1 (1) of Schedule 1 (page 17 of the Bill) which pertains to Indigenous students. Consideration should be given to Indigenous Australians who may have moved to metropolitan locations away from regional or remote parts of Australia for better career prospects yet may still be disadvantaged based on their past experiences as an Indigenous Australian.

ACN would like to commend the Australian Government Department of Education, Skills and Employment for undertaking this work and extend best wishes for further success in undertaking this consultation.



ACN is the pre-eminent and national leader of the nursing profession. We are committed to our intent of advancing nurse leadership to enhance health care. ACN is committed to ensuring that Australia's health system can meet the future needs of all Australians, particularly through the sustainable growth and development of the nursing workforce. ACN has members in every state and territory and works closely with nursing leaders and Chief Nursing and Midwifery Officers (CNMOs).

If you have further enquiries regarding this matter, please contact Dr Carolyn Stapleton FACN, Director of Policy, Strategy and Advocacy, at carolyn.stapleton@acn.edu.au.

Yours sincerely

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