



18 August 2010

Laura Lambie
Ministry of Health
Workforce
PO Box 5013
Wellington

Dear Laura,

Clinical Workforce to Support Registered Nurses (Draft: 10 July 2008)

Thank you for the opportunity to provide comment on the above report. The comments below are the feedback from the College of Nurses following member consultation and board discussion.

The formation of this committee and the absence of seemingly transparent and widespread consultation was a concern to the College. In addition the College is especially concerned about the lack of consultation with Maori and Pacific stakeholders

We are concerned that the very reason the committee was established, i.e. to determine a clinical workforce to support RNs was in itself a preemptive decision **without clearly establishing the nature of the problem to be solved**. The draft recommendations do not reflect the need to have a future focused response to future health workforce requirements but look to a past workforce configuration as the solution to an unidentified problem.

Principle 1: The College supports the concept of a 'middle' tier workforce supporting registered nurses but believes;

- 1) that it is **both premature and limiting** to assume this should be a regulated nursing workforce without further consideration of the needs of future service users, how services will be provided and the models of care that are likely to be needed.
- 2) that it is **both premature and limiting** to assume this workforce should be *confined* to the support of registered nurses without considering more future focused strategies.

Preliminary work needs to be done to establish clearly the nature and scope of the need by involving the wider sector in identifying future service needs to ensure that the workforce solutions identified have greater potential to be successful.

Principle 2: The College of course supports the notion of promoting a team-work approach to the delivery of care and the inclusion of support workers when considering how registered nurse-led teams within hospital and primary health care services will look in the future

There needs to be a great deal more thought given to the nature, structure, training and deployment of such team members. This process should involve the DHBs and the wider health and disability sector in addition to the regulatory authority, the education sector and include Ministry involvement.

Principle 3: The College supports the development of career pathways for all workforces including those that will support registered nurses and other health workers.

Principle 4: Too soon to comment in view of statements as above.

General comments

- 1) Future decisions on this issue should be based on a clear and agreed view from the sector on:
 - a) the service needs to be addressed
 - b) the future workforce options that are best designed to meet those service needs.
- 2) The committee should recall and explore the reasons why 2nd level nursing was ceased in 1993. Briefly, employers determined they were too expensive for a worker who had to practice under supervision and there were frequent examples (which continue today) of inappropriate and unsafe deployment.
- 3) The issues for Maori nurses have not been identified in the committee report. Anecdotal evidence suggests that School Counselors and others are inclined to direct Maori students towards second level nursing programs thus potentially depleting the Maori RN workforce. Maori nurse leaders in the College are clear that the focus should remain on increasing the number of Maori RNs
- 4) The report does not address the considerable pressure on diminishing nursing faculty to deliver the current BN program with tight resources, staffing challenges and limited clinical placements. The report makes an assumption that there is capacity within nursing to develop a whole new curriculum and teach a large number of new students. This needs a rigorous exploration before any decisions are made.

We see considerable risk to the health sector if this isolated approach to workforce planning occurs without rigorous consultation and careful analysis of the widest relevant parameters.

Yours sincerely

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