



# NEW SOUTH WALES NURSES' ASSOCIATION

In association with the Australian Nursing Federation

BH: ABU  
8 September 2010

Ms Anne Copeland  
Chair  
Nursing and Midwifery Board of Australia  
[mba.submissions@ahpra.gov.au](mailto:mba.submissions@ahpra.gov.au)

Dear Ms Copeland,

**Re: Consultation on the provision for nurses to hold both registration as an enrolled nurse and as a registered nurse at the same time.**

Thank you for the opportunity to comment on the above matter. The New South Wales Nurses' Association (NSWNA) is the industrial and professional body that represents over 53,000 nurses in New South Wales. The membership of the NSWNA comprises all those who perform nursing work, from assistants in nursing, who are unregulated, to enrolled and registered nurses at all levels including management and education.

Prior to 1 July 2010 in NSW, it was possible for the same person to be listed both as an enrolled nurse (i.e. registered as an enrolled nurse) and, if qualified, as a registered nurse also, if the person had completed the approved respective programs of education. This provided many of our members, particularly those in rural areas, with choice and the flexibility they needed to secure and maintain satisfying employment close to home.

The NSWNA considers that the provision for nurses to hold both registration as an enrolled nurse and as a registered nurse at the same time should be continued under the national registration scheme by the Nursing and Midwifery Board of Australia (NMBA).

### ***Public and patients***

NSWNA members have held dual registrations of this nature over many years without encountering instances where the public has been placed at risk of harm or actually harmed. In fact, allowing dual registration has, in some circumstances, ensured that nursing care has been able to be delivered to the public by appropriately qualified nurses rather than non-nursing or unregulated health workers, thereby increasing the safety of care for the public.

It is important that both individual nurses and employers are fully aware of the responsibilities of both registered and enrolled nurse roles. However, provided that an individual meets the NMBA's requirements for registration as a registered nurse and an enrolled nurse, i.e. completion of an approved qualification and competence to practise, NSWNA considers that allowing individuals to hold dual registration does not place the public at risk of harm.

### ***The individual nurse***

As stated above, NSWNA members have been able to hold dual registration in NSW for many years. This has allowed many of our members to ensure that they have continuing, sufficient and satisfying employment in their own regions.

For example, many enrolled nurses, who have subsequently completed approved programs and achieved registration as registered nurses, frequently have to wait for periods of weeks or months before they are able to commence work as first year registered nurses in suitable and available transition programs. These nurses need to be registered as registered nurses to secure the position but must continue to be registered as enrolled nurses so they can continue to work while waiting for the position to commence. If dual registration were not permitted many of these nurses would be forced to work as assistants in nursing.

In addition, some enrolled nurses, who have subsequently completed approved programs and achieved registration as registered nurses, can occasionally only find limited employment as a registered nurse in their own region or in a facility where they enjoy working. Being able to work as both a registered and enrolled nurse allows these nurses to receive a reasonable income and /or continuation of work in their preferred facility without the need for burdensome travel.

NSWNA considers that removal of the provision for dual registration would disadvantage nurses in these situations and risk negative outcomes for their home and family lives.

### ***Employers***

Dual registration for nurses can also bring benefits to employers. For example, in situations such as those described above where a small employer has a good relationship with an enrolled nurse who achieves registration as a registered nurse but only has an enrolled nurse position available, they may continue the relationship with their preferred nurse. This situation has occurred for some of our members.

However, it is critical that dual registration for nurses does not lead to exploitation of nurses by employers. That is, that in order to save money, nurses are employed as enrolled nurses when the nature of the care to be provided actually requires the position to be filled by a registered nurse. Or that nurses with dual registration are asked to perform registered nurse activities while being paid as an enrolled nurse.

NSWNA's experience has been that where nurses are aware of the distinctions between the roles of registered and enrolled nurses and the accountabilities and responsibilities of both roles, issues of exploitation are successfully avoided. Our members' experiences have generally been that the benefits of dual registration for nurses have outweighed the risks of negative outcomes.

The NSWNA considers that it is critical for the provision for nurses to hold dual registration to be continued under the national registration scheme by the Nursing and Midwifery Board of Australia (NMBA) so that nurses, most particularly in rural areas, are not unnecessarily disadvantaged.

Thank you again for the opportunity to provide comment on this matter on behalf of our members and please do not hesitate to contact Annie Butler, Professional Officer, at this office if you have any queries regarding the submission.

Yours sincerely



**BRETT HOLMES**  
General Secretary