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Tēnā koe

### **Nursing Council Supplementary Registered Nurse Education Programme Standards**

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the Nursing Council Supplementary Registered Nurse Education Programme Standards (the Standards).

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing 51,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment matters. NZNO embraces te Tiriti o Waitangi and contributes to the improvements of the health status and outcomes for all Aotearoa New Zealanders through influencing health, employment, and social policy development.

Furthermore, we share the intent of the Ministry of Health's definition of equity which equally applies to NZNO work across professional, industrial and member activities.

NZNO has consulted with members and staff in the preparation of this response. NZNO supports the participation of nursing students in structure learning opportunities. The NZNO National Student Unit believe the new Standards will be a vital resource for students struggling with clinical hours due to COVID. The Standards need to be well regulated and if the education providers and workplaces have a mutual understanding of the guidelines, then the students will benefit greatly.

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## **Consultation Questions and Responses**

### **1. Will these standards effectively support participation by all nursing students/ taura in the pandemic response workforce?**

- The Standards will booster the pandemic workforce supporting providers who have limited access to students and or placements.

### **2. Will these standards support a quality clinical learning experience for nursing students / taura?**

- There may be a variable response in the quality of clinical learning. The availability of quality placements with suitably qualified and enthusiastic preceptors may determine the experience and learnings.

### **3. Are there are any risks associated with implementing these standards, and if so how can these be mitigated?**

#### **Issues identified during the consultation include:**

- What are the criteria for significant disruption? We note that the Standards only apply in situations where the usual and Nursing Council accredited schedule of clinical placements, have been significantly disrupted due to restrictions imposed by the Government of Aotearoa New Zealand
- How are rapidly evolving services to be operationalised and fully supported? Is this directed by individual education / training providers, DHBs or Public Health Units?
- A lack of institutional certainty when legislation and clinical practice change daily
- Preceptors, NZNO values their preparation, experience, and credentialing. They as a group could become vulnerable, if they move away from their substantial role to accommodate COVID placements. There are also preceptors new to their role who would require support, what is available to them?
- Negative student perceptions. *If I were a student would this be good for me?*
- The Standards need to ensure students are well protected, and that the student's workplace now becomes a clinical learning environment. The workplace needs to fully understand and encourage this change
- COVID related student clinical learning placements. How will this be documented in the nursing student's clinical transcript? NZNO would support it being designated as medical, community medical nursing or public health
- There is a potential risk of isolation, with a lack of support and direct supervision. The situation is unlikely to improve with the introduction of additional vaccines. Once again, NZNO recommends a risk assessment for placements to ensure the students safety
- How will students meet all the domains of competency and what will the assessment for these placements look like?

- Paid employment and the implications for student nurses? Will a risk assessment be undertaken before any placements are allocated?
- It has been acknowledged that when a student is in paid employment, learning is not the priority. The student will focus on the work they are employed to do rather than follow up on learning opportunities. Furthermore, in a busy environment, that is very likely to be task related
- Paid employment has been described as a *slippery slope* back to utilising students as a part of the workforce, putting them under inappropriate stress and in difficult situations for which they are not prepared for. Nurses worked long and hard to move away from this model. While in the current situation and wanting to facilitate the students' ability to complete the required practice hours, a strong message needs to be included that states this is a unique situation that should be accommodated short term and not accepted as the norm
- Indemnity insurance, what are the implications for students in a Covid related placement
- Much of the COVID and related work appears relatively task orientated, and lacking critical thinking, and best practice guidelines. For example: preparing and administering injectable medication and documentation. Yet, it does provide opportunities to work in large teams and build relationships.
- International students, with a visa that only permits limited hours of paid employment. What are the implications for this group?
- Competency assessment programmes (CAP), confirmation is required that this groups is excluded from this initiative? NZNO recommends this group to receive the most appropriate placements and not just any placement
- What considerations are in place if a student were to be infected with COVID in the workplace? How would the loss of experiential learning be addressed? Will they be given further learning opportunities to make up for this?
- Student Enrolled Nurses (EN) are they excluded from the Supplementary Registered Nurse Education Programme Standards and process? Student ENs can be and are provisional vaccinators. Should student EN's be treated in a similar manner to that of a student nurses and offered accredited COVID placements?
- What are the financial or other returns to Nursing Council and potential employers if they can leverage down their costs for student placements using a COVID response?
- University and Polytechnic nursing programme, would the Standards be applied equitably across institutions? Who will monitor each education provider to ensure no student population is disadvantaged?
- What are the implications for the ACE Nursing process for New Zealand Graduate Registered nurses? Will it impact on the ranking and employment options for graduate nurses?

NZNO has also received anecdotal feedback about the difficulty of studying while working. Some students have also experienced being asked to withdraw from studies because they had worked in

the COVID response or leave the classroom / zoom because they are working in a vaccination clinic, or actively encouraging vaccination.

The intricacies of understanding the pathological side of the virus, the vaccine and educating communities about the situation we are in, has been identified as the most rewarding things of working in a COVID placement.

We thank you for the opportunity to provide feedback on the Nursing Council Supplementary Standards for Registered Nurse Education Programmes

Nāku noa nā

A handwritten signature in blue ink that reads "Lucia Bercinskas". The signature is written in a cursive, flowing style.

**Lucia Bercinskas**  
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