



27 October 2016

Level 2,
Favier House,
51 Cooyong St,
Braddon ACT 2608

Dear Minister of Education,

I write to you on behalf of Catholic Health Australia (CHA) which is the largest non-government provider grouping of health, community and aged care services in Australia. We nationally represent Catholic health care sponsors, systems, facilities and related organisations and services. A snapshot of the Catholic Health and Aged Care Sector includes:

- 19,000 residential aged care beds
- 6,253 retirement and independent living units and serviced apartments
- 8,000 Community Aged Care packages (CACP)
- 6,000 Home and Community Care (HACC) service recipients and Extended Aged Care at Home packages (EACH)
- rural and regional aged care facilities and services
- 9,500 beds in 75 health care facilities - publicly (21) and privately (54) funded hospitals and 7 teaching hospitals
- 8 dedicated hospices and palliative care services
- expanding day centres and respite centres

CHA is writing in response to the VET Student Loans Bill 2016, the VET Student Loans (Consequential Amendments and Transitional Provisions) Bill 2016, and the VET Student Loans (Charges) Bill 2016

CHA is concerned that:

- A. The HLT54115 Diploma of Nursing qualification** falls within the proposed \$10 000 band of the “Eligible qualification or course and loan caps” list. This loan cap will impose an unaffordable upfront cost for the majority of students who historically come from diverse range of backgrounds, education levels and age groups and do not always have the means to meet the tuition fees associated with a nursing qualification. **This will significantly and adversely impact on the future provision of Australian healthcare.**
- B. The HLT57915 Diploma of Anaesthetic Technology qualification** is excluded from the VET Student Loans Eligible Course list. Without student access to a VET Student Loan, this important course will be under subscribed. **This will impact negatively on the nationwide surgical waiting lists and directly affect the wellbeing of Australian people.**



The rationale for these concerns is further detailed below:

HLT54115 Diploma of Nursing qualification

ENs are registered health professionals who work as part of a healthcare team to provide person-centred care under the direct supervision of a registered nurse. ENs are employed in a diverse range of private and public organisations within the health sector, including small to large general medical practices, community health practices, hospitals, aged care facilities and after-hour clinics (SkillsIQ Enrolled Nursing IRC Four Year Workplan September 2016).

Contrary to the right to education, a loan cap of \$10,000 will marginalise the majority of those seeking a future in nursing and in particular disadvantages those who do not have the financial means to undertake vocational education and training.

Assuming that affordability will be a result of loan caps, it is conceivable that providers will offer affordable courses but deliver poor quality training to maintain student enrolments. Graduates from these providers will not be work ready and will find it difficult to find employment in the contemporary healthcare environment continuing the current issues the new scheme is supposed to repair.

A reduction in enrolment because of the loan caps (which is not indicative of the number of people wanting to become enrolled nurses) will result in a decreased Enrolled Nurses (EN) workforce. This will significantly and adversely impact on the future provision of Australian healthcare and is alarming given the Australian Government's 2014 report highlighted a nursing scarcity by 2025 – Figure A “a shortfall of 109,000 or 27 per cent on required staffing levels.” (p.72 Health Workforce Australia HWA [2014]: Health Workforce 2025: Consumer Edition).

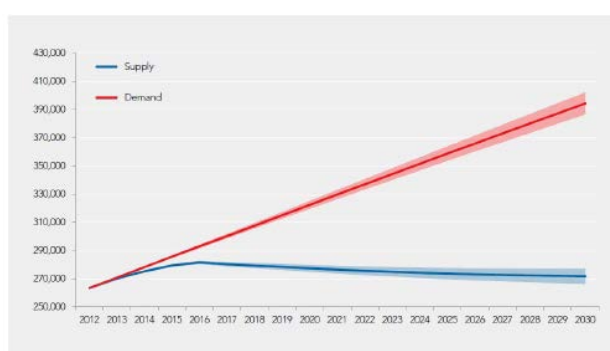


Figure A: Predicted Supply and Demand 2012 to 2030

(Health Workforce Australia 2014: Australia's Future Health Workforce – Nurses Overview, p.17)

The impact of the currently proposed loan cap

A loan cap on tuition fees will contribute to a **further paucity of ENs** and **will directly and negatively impact nursing services**, a service identified by the Australian Government's 2016



Labour Market Research - Nursing Professionals as playing “a vital role in the delivery of health, aged and community care. The demand for registered and enrolled nurses and midwives is expected to increase in coming years due to population growth, an ageing population and rising demand for health services” (June 2016 Labour Economics Office Queensland Department of Employment p.2).

Sustainability of Australia’s health workforce is already a recognised major challenge with health expenditure accounting for an increasing proportion of Australia’s gross domestic product (GDP) and rising at an unsustainable level. The health workforce is the single largest component of the health budget with the nursing profession the largest health profession in Australia. The Government decision to place a loan cap the Diploma of Nursing qualification will see a decrease in the EN workforce, creating a situation where RNs will work to less than their scope of practice, creating waste and driving up the cost of healthcare.

The Government’s proposed loan cap will require a significant student co-contribution and is therefore likely to provide a financial barrier to students who want to undertake this training and a career in nursing. Obviously, reduced enrolments due to the need for substantial self-funding will result in fewer graduates which in turn results in a reduction in the nursing workforce to support the aging nursing workforce already predicted to be under considerable future strain with the increased healthcare needs of an increasing aging population. This will also directly and negatively impact the priority population groups (Aboriginal and Torres Strait Islander (ATSI) people; people in rural and remote areas; socio-economically disadvantaged people) as there will be less ATSI ENs which is an existing problem highlighted by the Congress of ATSI Nurses and Midwives:

In 2014 the Australian Institute of Health and Welfare (AIHW) reported there were a total of 946 ATSI Enrolled Nurses across Australia, an increase of 117 since 2012. Based on 2014 national population projections there were 713,589 ATSI Australians living in Australia making up 3.03% of the total population. These figures represent an inadequate supply of ATSI Enrolled Nurses to serve this population group. The Congress of ATSI Nurses and Midwives (CATSINaM) has identified a need for 3.3 times the number of ATSI Enrolled Nurses to ensure an adequate supply of care. ATSI people have a much higher burden of disease, which ranges from two to five times that for non-ATSI people, depending on health condition (Congress of Aboriginal and Torres Strait Islander Nurses and Midwives (CATSINaM) 2016, Nursing and midwifery workforce need projections, viewed 11 July 2016.)

Positions currently taken up by ENs will be left vacant and/or filled by more expensive healthcare professionals and in some locations in Australia this decision will lead to an absence of healthcare workers. The Government’s loan cap decision on the Diploma of Nursing qualification will ultimately drive up the cost of health care delivery and lead to decreased accessibility to healthcare.

HLT57915 Diploma of Anaesthetic Technology

The **HLT57915 Diploma of Anaesthetic Technology** is proposed to be excluded from the VET Student Loans Eligible Course List. Without student access to a VET Student Loan, this course



will be undersubscribed which will impact nationwide surgical waiting lists and directly affect the wellbeing of Australian people.

Healthcare facilities MUST align with ANZCA's Professional Standard and surgery cannot proceed if the role of Anaesthetic Technician is not present. A current Anaesthetic Technician skill shortage exists in Perioperative environments and without this assistant surgery is cancelled resulting in prolonged waiting list times. Shortages exist in both public and private facilities throughout Queensland, with regional areas in particular in dire need for Anaesthetic Technicians.

The need to build a trained Anaesthetic Technician workforce is supported by data provided by ABS Labour Force (November Quarter 2015 – February Quarter 2016) which identified an increase of 87.5% need for Anaesthetists. A proportionate increase in the anaesthetic technician workforce is required to provide perioperative care to the Australian patient.

Industry Workforce Requirement

This qualification is required for the position of Anaesthetic Technician (an assistant to the anaesthetist). The Australian and New Zealand College of Anaesthetists (ANZCA) recognises the importance of the development of quality assistants to the anaesthetist, and guides the training of assistants by identifying the necessary core competencies (within PS8, www.anzca.edu.au) to assist with development of training curricula. ANZCA states "The presence of a trained assistant for the anaesthetist is essential:

- *During preparation for and induction of anaesthesia...*
- *During the maintenance of anaesthesia an assistant must be immediately available.*
- *At the conclusion of anaesthesia*

The presence of a trained assistant for the anaesthetist during the conduct of anaesthesia is a major contributory factor to safe patient management. Furthermore, the assistant must have undertaken appropriate training in order to provide effective support to the anaesthetist and the course developed and administered by an appropriate institute of learning." (ANZCA, PS8, www.anzca.edu.au).

Recommendations

CHA is concerned about the impact of this on Catholic Health, Aged and Community Care services in Australia. CHA is keen to ensure sustainable, high quality healthcare in Australia. This commences with effective, high quality entry level healthcare education programs. As per the Minister for Education and Training's power to specify an "**exemptions from loan caps for courses that result in a high social good but have high delivery costs**" (Aust Govt VET Student Loan Fact Sheet, viewed 12 Oct 2016), CHA requests the Government make the following recommendations:

1. **Exempt the HLT54115 Diploma of Nursing** qualification from a loan cap of this essential course to meet the current and future nursing workforce requirements as it has a high social good.



- 2. Approve the HLT57915 Diploma of Anaesthetic Technology** qualification to be included on the VET Student Loans Eligible Course List and exempt from a loan cap this essential course to meet the current and future nursing workforce requirements as it has a high social good.

“The time to act for 2025 is now. It has to be, to ensure we have a highly skilled and fully trained health workforce able to care for us – now and into the future” (p.72 Health Workforce Australia [2014]: Health Workforce 2025: Consumer Edition).

A handwritten signature in black ink, appearing to read "Suzanne Greenwood", is positioned above the printed name.

Suzanne Greenwood LLM LLB FAIM MAICD

Chief Executive Officer
CATHOLIC HEALTH AUSTRALIA