

# The Australian Government Department of Health's consultation on the proposed National Guidelines for Yellow Fever Vaccination Centres and Providers: APNA submission

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**15 September 2017**

The Australian Primary Health Care Nurses Association (APNA) welcomes the opportunity to contribute to the consultation on the proposed national guidelines for yellow fever vaccination centres and providers. We are providing this submission on behalf of our membership, Australian primary health care nurses.

Primary health care nursing refers to nursing that takes place within a range of primary health care settings, each sharing the characteristic that they are part of the first level of contact with the health system. In Australia, nurse practitioners, registered nurses (RN) and enrolled nurses (EN) practice in primary health care in a range of clinical and non-clinical roles, in urban, rural and remote settings.

## APNA Submission

### General comments

Many primary health care nurses routinely deliver vaccinations within their scope of practice. APNA believes that the breadth of the nursing role could be better reflected within the proposed national guidelines for yellow fever vaccination centres and providers.

### Comments on the proposed guidelines

#### *Vaccine administration*

The proposed guidelines state that, 'current practice in Australia is for medical practitioners to prescribe the vaccine with trained nurse immunisers administering the vaccine under the supervision of the prescribing medical practitioner'. APNA believes that this does not accurately align with current professional standards for practice and recommends replacing the word 'supervision' with 'delegation'. According to the Medical Board of Australia, '*delegation* involves you asking another healthcare professional to provide care on your behalf

while you retain overall responsibility for the patient's care'.<sup>1</sup> APNA believes this terminology better reflects the context of care.

Furthermore it should be noted that vaccine administration is not limited to trained nurse immunisers. Many nurses can administer vaccinations, within their scope of practice, and therefore APNA recommends removing reference to 'trained nurse immunisers' within the document and replacing it with 'authorised health workers (doctors or nurses)'.

#### *Completion of the International Certificate of Vaccination or Prophylaxis*

The proposed guidelines indicate that the medical practitioner is responsible for completing the International Certificate of Vaccination or Prophylaxis. APNA suggests that this be broadened to include 'authorised health workers (doctors or nurses)'. This would be in line with the World Health Organisation's International certificate of Vaccination or Prophylaxis.<sup>2</sup> Furthermore, the United Kingdom and United States currently permit 'authorised health workers', which includes nurses, to sign the International Certificate of Vaccination or Prophylaxis. Australia should consider aligning with international practices.

#### *Education and training*

Given that nurses, within their scope of practice, can administer yellow fever vaccinations, APNA recommends that the section titled *2.2.2. Requirements for Individual Medical Practitioners* be broadened to 'Requirements for Individual Medical Practitioners and Authorised Health Workers (doctors or nurses)'. APNA believes this section should incorporate education and training for nurses administering yellow fever vaccines within their scope of practice.

#### *Monitoring and compliance*

APNA believes there is a need for monitoring the implementation of these guidelines to ensure compliance. This may include accreditation surveyors routinely ensuring that medical practitioner and centre vaccination certificates are up to date. Furthermore, consideration should be given to ensuring that pharmacists are dispensing yellow fever vaccinations to accredited medical professionals and centres only.

APNA suggests that points one and two, under *2.2.3 Criteria for Assessing Vaccination Centres*, be incorporated into *Attachment A: Application for a Medical Practice to become an Approved Yellow Fever Vaccination Centre (Model form)*.

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<sup>1</sup> Medical Board of Australia. Good Medical Practice: a code of conduct for doctors in Australia. 2017. Available from: <http://www.medicalboard.gov.au/Codes-Guidelines-Policies/Code-of-conduct.aspx>

<sup>2</sup> World Health Organisation. International certificate of vaccination or prophylaxis. 2017. Available from: [http://www.who.int/ihr/ports\\_airports/icvp/en/](http://www.who.int/ihr/ports_airports/icvp/en/)

## About APNA

The Australian Primary Health Care Nurses Association (APNA) is the peak professional body for nurses working in primary health care. APNA champions the role of primary health care nurses; to advance professional recognition, ensure workforce sustainability, nurture leadership in health, and optimise the role of nurses in patient-centred care.

APNA is bold, vibrant and future-focused. We reflect the views of our membership and the broader profession by bringing together nurses from across Australia to represent, advocate, promote and celebrate the achievements of nurses in primary health care.

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