

Submission by the Australian Nursing and Midwifery Federation

Public Consultation: Professional capabilities for registered paramedics

30 November 2025



**Australian
Nursing &
Midwifery
Federation**



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Introduction

1. The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 345,000 nurses, midwives, and care-workers across the country.
2. Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.
3. Our strong and growing membership and integrated role as both a trade union and professional organisation provides us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.
4. Through our work with members, we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.
5. The ANMF thanks the Paramedicine Board and Ahpra for the opportunity to provide feedback on the *Proposed update of the Professional capabilities for registered paramedics*. The ANMF would like to acknowledge its support for the excellent emergency and prehospital care that paramedics deliver to Australians in many contexts.



Consultation Questions

Is the content of the proposed capabilities clear and reflective of autonomous and contemporary paramedic practice? If no, please explain why.

6. The ANMF's view is that the professional capability for registered paramedics is the domain of paramedics, and consequently, that professional group is best placed to prepare the commentary on their practice capabilities. The ANMF would expect that there is no cross over between the roles of paramedics and nurses or midwives, in respect to their professional capabilities. The ANMF would not expect that paramedics comment exclusively on nurses or midwives professional capabilities. The ANMF recognises the valuable work performed by paramedics currently and supports the development of the *Proposed update of the Professional capabilities for registered paramedics*.

Is there any content that needs to be changed, removed or added in the proposed capabilities? If yes, please provide details.

7. Yes, we have provided some additional content that the Paramedicine Board and Ahpra should consider for the *Proposed update of the Professional capabilities for registered paramedics*.

8. *Domain 1 – Paramedic.*

Key Capability 1 - Seek the support of other emergency or health services where required to assist with patient assessment and care. The ANMF recommends the insertion of a statement which confirms there would be reference to a health practitioner or escalation to a health practitioner in this statement to improve its clarity.

Key Capability 2 - Recognise limits of own expertise and when the treatment or care indicated is out of scope and seek support from or refer to other health practitioners. The ANMF recommends the insertion of a statement that refers or escalates to a health practitioner to be included in this statement to improve its clarity. *Domain 5 - Quality and risk manager*



Key Capability 2. This capability discusses protecting and enhancing patient safety but does not mention a strong understanding of human factors and the overarching principles of patient safety. The ANMF suggests incorporating these principles into this domain and corresponding capability statements by providing more detail. This change would strengthen the domain on how patient safety principles are effectively used in the everyday practice of a paramedic.

Would the proposed capabilities result in any potential negative or unintended effects for people requiring healthcare, including members of the community at risk of experiencing poorer health outcomes? If yes, please explain why

9. As these proposed updates have been designed to update paramedic capabilities, the ANMF cannot foresee any potential negative or unintended effects for people requiring healthcare, including members of the community at risk of experiencing poorer health outcomes. Updating the *Professional capabilities for registered paramedics* highlights the Paramedicine Board and Ahpra's commitment to public safety and the recognition of advances in healthcare. But if changes are introduced without adequate workforce support, training, and system readiness, this can create significant risks for patients, families, and communities.

Would the proposed capabilities result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples? If yes, please explain why.

10. Due to the consultation approach that has been succinctly described within *the Proposed update of the Professional capabilities for registered paramedics* the ANMF cannot identify any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples. This approach will ensure ongoing community consultation and feedback loops and potentially reduce the incidence of negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples.



Would the proposed capabilities result in any potential negative or unintended effects for paramedics? If you, please explain why.

11. If not already commenced the ANMF recommends that the Paramedicine Board and Ahpra consider any relevant industrial implications for the paramedic workforce due to the *Proposed update of the Professional capabilities for registered paramedics*. Without industrial recognition there may be uncertainty around entitlements and or career progression which could undermine workforce attraction and/or retention for currently registered paramedics. There needs to be engagement from the Paramedicine Board and Ahpra with the current paramedicine workforce because any change to practice can place unreasonable and unsustainable pressures on the workforce unless appropriate safeguards and support measures are implemented.

Are there any other potential regulatory impacts the Board should consider? If yes, please provide details.

12. Yes, there are regulatory impacts that the Board should consider for the *Proposed update of the Professional capabilities for registered paramedics*. The Board, if not already done, should assess workforce readiness, aligning changes with state and or federal legislation, training requirements and whether employers have appropriate clinical governance in place. Additionally, the proposed updates for the professional capabilities may impact interprofessional boundaries and public understanding of what paramedics are authorised to do. The ANMF is aware that a number of paramedics may also hold nursing or midwifery qualifications. It is essential to clarify whether the proposed capabilities will impact those with a dual qualification. This would need to include recognition by the Nursing and Midwifery Board of Australia and integration with nursing and midwifery standards of practice where applicable.



Do you have any other feedback on the proposed capabilities?

13. Paramedics are increasingly taking on innovative roles across the healthcare sector, engaging in employment outside jurisdictional ambulance services and managing non-emergency and low acuity patients. The proposed updated capabilities account for the varying contexts and changing nature of paramedic practice while maintaining fundamental elements including emergency response and high acuity care.
14. We reiterate the concerns raised in our previous submissions regarding advanced practice paramedics and the associated risk of scope creep. We acknowledge that while advanced practice paramedics are not included in the proposed update of the professional capabilities for paramedics, the role of paramedics must remain distinct from nursing practice with clear professional boundaries.
15. It is essential that paramedics do not assume responsibilities traditionally held by nurses and midwives, particularly in the care of low acuity care, aged care and non-emergency patients. The primary focus of paramedic practice should remain in emergency and prehospital care.
16. P. 18 of the consultation paper states *that paramedics apply knowledge and understanding of the Australian healthcare system and roles of paramedics in different settings and locations of practice including non-traditional practice contexts....* The ANMF does not support this statement and is concerned about the potential impact on nurses or midwives. It is essential that the *Proposed update of the Professional capabilities for registered paramedics* is clear and maintains strict professional boundaries with a defined scope of practice. This will ensure the right clinician, at the right time, is in the right place, i.e. the appropriate health practitioner, not a substitute one.
17. Paramedics are educated and trained as first responders and are a necessary and vital part of the health workforce. The ANMF does not support expansion of paramedic practice which will result in paramedics assuming roles held by nurses or midwives, especially in primary care and community settings or non-traditional practice contexts. The expansion of paramedic roles into these areas is unnecessary and not warranted. The ANMF does support



paramedics expanding their knowledge and skill through postgraduate study that enhances their ability to provide excellent prehospital care or emergency care.



Conclusion

18. The ANMF thanks the Paramedicine Board and Ahpra for the opportunity to provide feedback on the *Proposed update of the Professional capabilities for registered paramedics*. As a key stakeholder representing the nursing and midwifery workforce, our involvement will help ensure alignment with existing practice frameworks and support safe, collaborative interdisciplinary care across the health system.