



Commission for Gender Equality
A society free from gender oppression and inequality

**Nursing Practice standards for use in all nursing
establishments in South Africa
(issued by the South African Nursing Council in terms
of the Nursing Act 33 of 2005)**

*Commission for Gender Equality Written Representations to the South
African Nursing Council*

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1 Introduction

The Commission for Gender Equality (CGE) wishes to express its gratitude for the opportunity to make written representations regarding the Nursing Practice Standards for use in all nursing establishments in South Africa.

The CGE, as an independent statutory body created in terms of Chapter 9 of the Constitution of the Republic of South Africa, 1996 (the Constitution), is mandated to promote and protect gender equality in government, civil society, and the private sector.

The Commission for Gender Equality Act 39 of 1996 ('the CGE Act'), gives the Commission the power to:

- Monitor and evaluate policies and practices of organs of the State at any level.
- Monitor and evaluate statutory bodies and functionaries.
- Monitor public bodies and authorities and private businesses, enterprises, and institutions to promote gender equality.
- Make any recommendations that the CGE deems necessary.

2. Background

The CGE welcomes the opportunity to make inputs into Nursing Practice Standards for use in all nursing establishments in South Africa. Section 27(1)(a) of the Constitution states that everyone has the right to access



health care services, and nurses are an essential part of healthcare provision.

However, the provision of these healthcare services has been plagued by several inefficiencies. There are various challenges in providing quality healthcare in South Africa,¹ including human, financial, and material resources, lack of training, poor infrastructure, and a lack of clinical care space. These challenges have been found to exist across most healthcare providers, which have a ripple effect on the provision of healthcare services.²

Recently, the CGE conducted an investigation into the state of maternity care within state hospitals in the Eastern Cape, which culminated in our report entitled '*The state of maternity health care in the Eastern Cape Province (2023/2024)*'. This investigation revealed many of these inefficiencies to be existing.

Nursing care requires several skills and proficiencies that have been incorporated into healthcare standards, legislation, and frameworks. However, non-compliance with these standards has led to a concerning number of medical negligence cases which in turn has placed a strain on available resources.

¹ Nyelisani, Makhado & Lualima, A professional nurse's understanding of quality nursing care in Limpopo province, South Africa, *Curationis* 46(1), a2322. <https://doi.org/10.4102/curationis.v46i1.2322>

² Nyelisani, Makhado & Lualima, A professional nurse's understanding of quality nursing care in Limpopo province, South Africa, *Curationis* 46(1), a2322. <https://doi.org/10.4102/curationis.v46i1.2322>



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3. The CGE's Submissions

In light of the above, the CGE makes the following submissions in regard to the proposed Nursing Practice Standards:

3.1 *Exclusion of the Ideal Hospital Realization and Maintenance Framework*

The CGE notes the legislative framework, regulations, and policies listed in Regulation number 1.2.1. However, the CGE is concerned about the exclusion of the Ideal Hospital Realization and Maintenance Framework and Office of Health Standards Compliance which provide crucial elements that points to the standards expected not only from healthcare providers but from nurses as well, standards such as patient care, waiting times and records management.

3.2 *Risk Management*

The CGE also notes item 1.5 concerning risk management, however, the outcomes make no mention of risk identification in the complaints handling process. This must be incorporated into the process.



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3.3 *Patient Safety Index*

Item 1.6 covers deals with the Patient Safety Index (PSI). However, the Standards and Regulations are vague and do not deal with PSI risks applicable to certain units and the specific standard of care required for those units. The standard of care differs for different units and the Regulations should adequately address what is expected from nurses in each of these.

3.4 *Quality Improvement Plans*

The CGE acknowledges the inclusion of Quality Improvement Plans (QIP), however, the standards do not encourage the strict implementation of the QIPs and there is no mention of audits especially in QIPs applicable to nurses.

3.5 *Experiences of healthcare users*

Item number 1.10 deals with healthcare users' experience of nursing care and the CGE wishes to bring the South African Nursing Council's attention to the CGE report mentioned above. This report flagged the high number of staff attitude complaints in providing healthcare services. The hospitals included in the investigation attributed staff attitude complaints to the fact that nurses were overworked. In light of this, the CGE submits that these Nursing Standards should include measures and systems to address the issues experienced by healthcare users. The Council must also take cognizance of how nurses can assist



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with reducing waiting times, which also affects the experience of healthcare users.

3.6 *Nursing Care Processes*

Item 4.6 relates to nursing care, and the CGE recommends that the standards include adequate care notes and regular monitoring. In maternal healthcare cases, the CGE recommends that the standards encourage proper interpretation of CTG scans and other medical equipment required in nursing care.

3.7 *Records Management*

Regarding records management in item 4.9, the Standards state that nurses must develop measures and systems for creating and maintaining concise and adequate records including archiving records. The CGE recommends that the Standards be more detailed in terms of what is expected from nurses regarding record keeping. Considering the various frameworks that cover this area, the standards must encourage efficient administration.

3.8 *Professional development of nurses*

Item 5.1 addresses continuing professional development, but the specifics of this in the standards are vague. The CGE supports the idea of continuous training in line with the developments in the medical field and the changing needs of patients and encourages the training of



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midwives to promote adequate maternal healthcare. However, this needs to be more clearly set out in the Standards.

The CGE further recommends the introduction of a compulsory module to the nursing qualification on gender and transformation. This is informed by the preliminary findings of the CGE's provincial investigations in the Eastern Cape and KwaZulu Natal provinces that highlighted the need to sensitize the health care practitioners on gender transformation.

4. Conclusion

The CGE commends the South African Nursing Council's commitment to developing these standards in line with the changing landscape of healthcare and hopes that the Council will monitor the implementation and non-implementation of these standards when they receive the complaints. However, the standard as published has several gaps which have been set out above. The CGE would therefore encourage the Council to be mindful of these and address them in the Standards, including the introduction of a compulsory module on gender transformation to the nursing qualification.

END