Dear Sir/Madam

Draft clinical practice guideline for the management of borderline personality disorder

The Australian Nursing Federation (ANF) has reviewed the consultation paper Draft clinical practice guideline for the management of borderline personality disorder issued by the National Health and Medical Research Council.

The ANF welcomes the development of the clinical practice guidelines and considers this document a useful and informative guide for registered nurses, midwives and enrolled nurses who may be involved in the care of persons with Borderline Personality Disorder (BPD) and their families.

With a membership of over 214,000 the ANF is the largest professional and industrial organisation in Australia for nurses, midwives and assistants in nursing. Members of the ANF are employed in a wide range of health and aged care settings in urban, rural and remote locations in both the public and private sectors.

The ANF participates in the development of policy relating to nurses, midwives and assistants in nursing on issues such as: practice, professionalism, regulation, health and aged care, community services, veterans’ affairs, education, training, workforce, socio-economic welfare, occupational health and safety, industrial relations, social justice, human rights, immigration and migration, foreign affairs and law reform.

Within our membership are mental health nurses, maternal, child and family health nurses and school nurses, to whom these guidelines have particular relevance. The ANF therefore welcomes the opportunity to contribute to the consultation on the clinical practice guidelines, and submit the following amendments to strengthen what we see as an important document.

Whilst the clinical practice guidelines repeatedly refer to ‘Health Professionals’ involved in the care of persons with BPD, there is no definition of this term in the section titled Special Terms on pages 11-17 of the guidelines. We contend there is merit in providing a definition of ‘Health Professional’, and, ask that all registered nurses (inclusive of mental health nurses), registered midwives and enrolled nurses, be included in this definition.
Mental Health nurses are currently not included in the definition of ‘Main Clinician’ on page 13 of the clinical practice guidelines in the section titled Special Terms. Given the critical involvement of mental health nurses as the persons designated main point of contact “…taking responsibility for coordinating care provided by other services” (p. 13) we submit that mental health nurses should be included in this definition, and throughout the guidelines.

Recommendation 39 on page 26 of the clinical practice guidelines is supported. However, we believe this can be improved by inclusion of the imperative to ensure health professionals within the emergency department are provided appropriate education and training to enable them to identify persons with BPD. Health professionals need to be fully cognisant of the evidence based response around BPD, as outlined in the clinical practice guidelines.

We suggest, therefore, that Recommendation 39 be improved to include:

*Education and continuing professional development opportunities must be provided to all emergency department nurses regarding the new Clinical Practice Guidelines for the Management of Borderline Personality Disorder, thereby assisting these health professionals to more effectively respond to people presenting to emergency departments.*

There is a need to clarify the intended users outlined on page 35 of the clinical practice guidelines. Specifically, ‘intended users’ needs to be expanded to all registered nurses, registered midwives and enrolled nurses who may be involved in the care of persons with BPD, and not just those who practise in a specialist mental health setting.

Whilst acknowledging the intent of Recommendation 59 of the clinical practice guidelines, the terminology could be improved to better reflect that used in the Report of the Protecting Victoria’s Vulnerable Children Inquiry, January 2012 (Department of Premier and Cabinet, Victoria http://www.childprotectioninquiry.vic.gov.au/) to include the need to:

- assess individuals suffering BPD within the context of their family environment;
- make assessment of any risk to children within their care; and,
- make appropriate intervention to prevent or intervene around such risk.

Mental health nurses and Nurse Practitioners are not currently included as health professionals who have a major role in the health care of people with BPD, as outlined on page 128 of the clinical practice guidelines. The ANF argues that mental health nurses and Nurse Practitioners play a critical role in this space and thus should be included in the health professionals listed on page 128.

The ANF supports and welcomes dot point 3 of page 135 of the clinical practice guidelines, which identifies that training in BPD recognition and management “…be incorporated into undergraduate medical and nursing education…” and therefore suggest that this be translated into a formal recommendation within the clinical practice guidelines.

While welcoming the intent of Recommendations 59-64, the ANF suggests these recommendations should identify the unique capacity that maternal, child and family health nurses and school nurses have in identifying individuals with BPD; assessing such persons within their family environment - and any risk to children in their care, and, making appropriate timely interventions to circumvent such risk.
The Report of the Protecting Victoria’s Vulnerable Children Inquiry, January 2012 recognises that maternal, child and family health nursing services are widely considered the cornerstone of the preventative effort required to support all Victorian children and families (p.132). We suggest that Recommendations 59 - 64 of the clinical practice guidelines likewise specifically identify the critical role and capacity of maternal, child and family health nurses and school nurses to intervene around BPD.

The foregoing amendments are submitted to the NHMRC to assist in strengthening the clinical practice guidelines for a significant cohort of their intended users - the nursing and midwifery professions. Thank you for the opportunity to contribute to this important consultation and we look forward to learning of the release of the finalised document.

Should you require any additional information or wish to discuss this matter further please contact Elizabeth Foley, Federal Professional Officer, on (03) 9602 8500 or elizabethf@anf.org.au.

Yours sincerely,

Lee Thomas
Federal Secretary