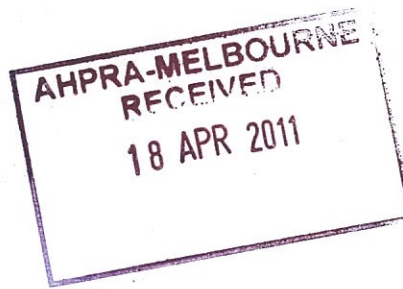


Ms Anne Copeland
Chair of NMBA
G.P.O Box 9958
Melbourne Vic 3001
13 April 2011



Dear Anne

Thank you for your letter dated March 10th regarding professional indemnity insurance for midwives and for giving us an opportunity to comment.

The Western Australian Branch of the Australian College of Midwives supports the maternity care reforms and the opportunities they bring for the profession of midwifery.

Please find our comments below regarding the three issues under consideration by the NMBA:

1. Revised Professional Indemnity Insurance Arrangements Registration Standard.

We support the revised Professional Insurance Arrangements Registration Standard.

2. Newly developed Guidelines: Professional Indemnity Insurance for midwives.

We support the newly developed guidelines for professional indemnity insurance for midwives but seek clarification on run-off cover. It states midwives are exempt for run off cover under the National Law for homebirth care (page 7). Does this mean if a midwife only provides homebirth services (including antenatal and postnatal care) they are exempt or does this mean midwives that only provide intrapartum homebirth (no antenatal or postnatal care) services are exempt? We would appreciate clarification about this as there is considerable confusion amongst midwives. The latter scenario would be extremely rare.

3. Regarding the two approaches being considered by the Board.

We support Approach 2, that The Board does not specify a minimum amount of cover for professional indemnity. We are concerned that stipulating a quantum of cover in relation to PII will be problematic for several reasons. Firstly, there will be a tendency to seek equivalence with medicine and this is problematic as the scope of practice and inherent risk in midwifery practice is quite different. Secondly, there is no claims history on which to base this and support a fixed level of cover. Current flexibility in the insurance products available provides options for midwives who only provide homebirth services and/or who attend only a few births a year. We support the self-assessment criteria developed by the Board and believe this flexible approach is much more reasonable and practical than stipulating a minimum cover of insurance.

Thank you for the opportunity to provide feedback about these important developments.

Kind regards

A handwritten signature in cursive script that reads "Terri Barrett".

Terri Barrett
President
ACM WA Branch