

**From:** [REDACTED]  
**To:** [nmbafeedback](#)  
**Subject:** Review of registration standards for the eligible midwife  
**Date:** Sunday, 16 November 2014 3:59:17 PM

---

To the Executive Officer

Re: Review of registration standards for the eligible midwife - submission

I hereby submit my response to the national board regarding this review.

I believe the content of the draft revised registration standards are more workable, relevant and clearer than the current standards.

I believe that the eligible midwife should be able to choose whether they practice across the continuum of care, or whether they prefer only shared-care roles, or whether they wish to specialise in one type of care eg. Only providing postnatal care. Not all midwives have the support of their family and friends in order to practice across the continuum ie being on-call and available 24 hours a day, 7 days a week. Only a small minority of midwives have this family support in order to work this way so therefore, it is unfair for midwives who do not have this support (eg in order to leave their children while on call). These midwives should still be able to provide shared care in the community for low risk women for antenatal and postnatal care.

Further, I believe this should not be specified in their notation, as midwives are trained to work across the continuum, regardless - since that is what they are trained to do - if they so choose.

I believe that the standard criteria of "registration as a midwife constituting the equivalent of 3 years full time within the past 6 years" should be removed. Midwives are professionals and are able to work professionally once they are a new graduate as the training they have received covers all aspects required to be a midwife in private practice who is providing collaborative care with a doctor or health service.

Further to this, I believe many midwives who have had any sort of maternity leave will be discriminated against with this requirement. If a midwife is registered, then she is able to practice according to the international definition of a midwife - able to practice in any setting, professionally, according to his/her own scope of practice.

However, I do agree with actions that will increase the availability of midwifery services that women are able to access through MBS.

I also wish to support the expansion of the number of midwives able to practice in private practice so that the general public start to learn what a midwife actually is and that this option for care is actually available. In my experience, many families still aren't aware of

this.

Thanks for the opportunity to comment. I do not wish to make my comments publicly available on the internet.

Regards

Andrea Anderson  
Midwife