

From: [REDACTED]
To: [nmbafeedback](#)
Cc: [REDACTED]
Subject: Review of registration standards for the eligible midwife
Date: Monday, 17 November 2014 11:11:40 PM

Please find my comments as below:

The National Board is inviting feedback on the following questions.

1. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standards?

It is clear and mostly more workable with some exceptions. Some of the simplifications by deleting some areas and including them within registration are sensible

2. Should the registration standard require an eligible midwife to practice across the continuum of care or should eligible midwives be able to have a specified context of practice listed on their notation?

It is appropriate for midwives to be able to choose their preferred area of practice, providing they are not restricted by the registration process. A midwife has already undergone a training program that entitles her to work in whichever area of midwifery she chooses providing she is within her scope of practice. This is not a registering body's concern unless she has been shown to be unsafe for some reason and should have restrictions placed upon her. Thus context of practice should not appear on the notation – it should be assumed that she will choose which area to practice within, and that she will do so safely and within her scope.

3. Is there any content that needs to be changed or deleted in the registration standard?

This suggested criteria is flawed and should be removed:

"Registration as a midwife constituting the equivalent of 3 years full time / 5000 hours within the past 6 years across the continuum of care or specified context of practice." This is restrictive and will inhibit the number of eligible midwives. Impacts such as work/family demands, part-time work, maternity leave, extended sick leave may all reduce the possibility of some midwives meeting this criteria, despite the midwife being skilled, experienced and knowledgeable with recency of practice. Including this new criteria will further restrict the availability of eligible midwives for women in our community.

It should remain as per the current standard:

Midwifery experience that constitutes 3 years full time post initial registration as a midwife.

4. Is there anything missing that needs to be added to the registration standard?
5. Do you have any other comments on the registration standard and options presented?

Thanks for the opportunity to comment,
Sincerely
Emily

Emily Daw, Registered Midwife

[REDACTED]
[REDACTED]