



23 June 2014

Ms Tanya Vogt
Chief Executive Officer
Nursing and Midwifery Board of Australia
nmbafeedback@ahpra.gov.au

Dear Ms Vogt

Re: Public consultation paper Draft revised Safety and quality framework for midwives

Thank you for the opportunity to comment on the *Draft revised Safety and quality framework* (Draft SQF)

The ANMF represents the largest number of registered midwives in the country, with over 19,000 members registered as midwives. This is more than half of all registered practising midwives in Australia, according to the total number of 33,436 shown in the April 2014 statistics for the Nursing and Midwifery Board of Australia (NMBA)

We offer the following comments for consideration on the Draft SQF.

Key Principles

AHMAC articulated eight key principles in *Primary Maternity Services in Australia – A Framework for Implementation* (2008). These Key principles were a driver in the development of the SQF. In the ensuing years, each of these key principles have been incorporated into various items of the NMBA Professional Practice Framework (PPF). Given this, development of the Draft SQF based on these key principles now becomes redundant.

The requirements under s284 of the National Law for privately practicing midwives claiming Professional Indemnity Insurance (PII) exemption are the only aspect of the Draft SQF not already addressed by the NMBA PPF. The “SQF” for all midwives is, in fact, the NMBA PPF. As a consequence, ANMF contends the only document required, other than the NMBA PPF, is one which outlines the requirements for privately practising midwives (PPMs) attending homebirths to claim exemptions from PII arrangements.

Protection of the Public

Protection of the public requires all midwives practice within the NMBA PPF. Specific requirements set out in the Draft SQF for PPMs attending homebirths will never affect most practising midwives. We know that around 0.4% of all births are homebirths, and we also know there are a number of homebirths occurring through the public sector, with successful models in most states, particularly (but not only) in Victoria and Western Australia (*Australia's Mothers and Babies* 2011, AIHW). These are an extension of services offered to women by public hospitals.

We reiterate the only document required is one outlining the requirements for PPMs attending homebirths to claim exemptions from PII arrangements.

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Timing

There are a number of other reviews underway that should influence the Draft SQF for PPM. These include the NMBA *Registration standard for eligible midwives* and the ANMAC *Accreditation standard for eligible midwives*. It is of great concern to ANMF that the profession is being asked to make comment on the *Draft revised safety and quality framework (SQF) for midwives* in the absence of the completed revision of these standards. This review should be suspended until other NMBA and ANMAC reviews are completed.

Supervision

While registered midwives and eligible midwives work in collaboration with medical practitioners, they are not ever supervised in their clinical practice by medical colleagues, nor by any other non-midwife health practitioner. Any references to this should be removed.

Midwifery practice review (MPR)

The place of the MPR in both the NMBA *Registration standard for eligible midwives* and the ANMAC *Accreditation standard for Eligible Midwives* is questionable. ANMF has stated our doubts around the MPR process previously with our fundamental objection arising from a lack of evidence that MPR improves safety and quality outcomes. It is also the view of the ANMF that the MPR is not readily accessible, is expensive and is not a program that is able to be regulated through the ANMAC process; nor is it provided by a higher education provider already offering midwifery education, registered with and meeting TEQSA Standards.

There should be no requirement for MPR in the new document.

Definition of a midwife

ANMF understands the definition used in the Draft SQF is that of the ICM. We appreciate the NMBA is not able to change the ICM definition, however, should the definition be used in the resultant document, an explanation for the Australian context should be made. We are concerned at the use of the words 'partnership' and 'equality'. This is a 'professional relationship' between the woman and the midwife. The level of knowledge, and therefore power, held by the midwife negates a truly equal 'partnership' in that relationship. The new document must focus on the professional obligations of the midwife to the woman rather than fostering notions of friends or partner. As such, a definition of 'professional relationship' should be included for the Australian context.

Consultation and referral

There is significant reference in the Draft SQF to the Australian College of Midwives (ACM) *National midwifery guidelines for consultation and referral*. The ANMF has two points to make regarding this document. These Guidelines were made in consultation with ACM members and not the broader midwifery profession. Secondly, these Guidelines are available only from the ACM. For non-members of the ACM (some 29,000 practising registered midwives or nurse/midwives), and for the public, this document is available at a cost of \$24.75. All other documents making up the Draft SQF are available to midwives (and to the public) free of charge via the NMBA website as the NMBA PPF.

The *National midwifery guidelines for consultation and referral* should be deleted from the Draft SQF, or made available at no cost and via the NMBA website while those guidelines are reviewed with broad consultation across the midwifery profession.

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Scope of practice

It is important that the National Board recognises and is clear in its documentation that each individual midwife does not have to work across the full scope of practice possible for midwifery practice (continuum of midwifery care). ANMF recommends any reference to scope of practice should include reference to the midwife's own professional obligations, as outlined in the NMBA PPF.

In conclusion, the ANMF maintains the "SQF" for all midwives is the NMBA PPF. The only document required, other than the NMBA PPF, ANMF contends is one which outlines the requirements for PPMs attending homebirths to claim exemptions from PII arrangements. Further, the document required for PPMs attending homebirths seeking exemption from PII arrangements needs to provide clarity of annual evidentiary requirements and auditing, where this Draft SQF does not.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Thomas'.

Lee Thomas
Federal Secretary

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