



National Committee
PO Box 1190
Blackburn North, VIC 3130

Australia's national maternity consumer advocacy organisation

Nursing and Midwifery Board Australia (NMBA)

27 June 2014

Safety and quality framework for midwives consultation

Thank you for the opportunity to provide feedback with regards to the revised Safety and Quality Framework (SQF) for Midwives.

Maternity Choices Australia (MC) is concerned that the SQF is being reviewed separately from other elements of midwifery guidance and governance, some of which are also currently under review. We believe that each element must be assessed in the context of a whole system of support and guidance for midwives, especially in private practice.

In principle feedback:

- We support extension of the SQF to incorporate all midwives rather than focusing on private practicing midwives attending homebirths.
- MC has consulted with the Australian College of Midwives (ACM) on their submission on the SQF and support their seeking of advice from the NMBA with regards to the lack of specific guidance for Private Practicing Midwives (PPM's) providing homebirths. With the exemption fast approaching it is a concern to us if this revised SQF will be relevant and we feel that resolution of this matter is of high priority to undertake a review of the revised framework. Without knowledge of the period post exemption it is difficult to ascertain if this document will be relevant for a significant period of time.

Specific feedback to the draft:

- p2: MC does not support the description of "shared responsibility" between midwives and women. We consider it essential that each party has a clear understanding of their own responsibilities, some of which might be held by both parties. This is essential to the principle of informed choice.
- P3: MC supports the core elements of framework and the list of elements provided is clear.
- Table 1: The requirement of informed consent with evidence of this being, "Any other information required by the National Board", would be better understood if examples were given of what this information could be.
- Table 2: As mentioned above, there is reference to the exemption and without knowledge of post exemption period it makes this difficult to understand. Of particular concern to consumers is, "Provide evidence of supervision from an eligible midwife or medical practitioner." As supervision is not yet defined and concurrently being explored by NMBA

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we feel that this requirement is making assumptions of what supervision for midwives is going to entail.

- Table 2: MC is unsure how a private practicing midwife working towards eligibility is going to be recognized and therefore fall into the third column. We propose at this stage that this is removed.
- Table 3: It is unclear in its current form and would be easier to read if separated into two tables rather than one. The format is suggesting that the Policy and the Legislative columns somehow correlate, which they don't.

MC, as mentioned above, is concerned with the fragmentation of current reviews and propose these policies would better serve their purpose if the same individuals were part of all consultations. Maternity Choices Australia proposes the solution is to form a review committee with NMBA, midwives and consumers, covering all changes to legislation, supervision eligibility and frameworks.

We thank you for the opportunity to comment on this Safety and Quality Framework. We believe this document is of utmost importance. Our concerns always lay with the consumer and ensuring there is no unintended consequence from the SQF reducing women's maternity options - because it would then mean the SQF had the opposite effect - forcing some women into maternity care options that are not regulated, probably not safe, and not the optimal option they would have chosen in different circumstances.