

I make this submission as a concerned mother and midwife. I wish to make a number of points:

- Midwives are registered in this country following a course of study which makes them eligible to practice the full scope of midwifery as defined and endorsed by the International Midwifery Commission's (ICM). They are trained and able to provide care to women and refer for medical opinion and consultation as necessary. They do not require the permission of doctors to work as midwives.
- If legislation concerning the registration of health professional is passed in its current form, from July 1st 2010 it will be illegal for midwives to provide a homebirth service *unless* they are indemnified by insurance provided vicariously through a state government endorsed service. The need for insurance thus becomes a barrier to the provision of services by midwives who do not wish to be supervised by doctors and bureaucrats from medically dominated maternity services.
- If, as the draft legislation states concerning scope of practice, *'legislated restrictions on the right to practice for reserved areas of practice should relate to the level of risk to the consumer* (Page 12) then no such restrictions should be made; much evidence based research confirms the *safety* of homebirth for healthy women.
- So the issue for midwives becomes one entirely based on a barrier to practicing as professionals, namely insurance. As those proposing to legislate such restrictions cannot justify them on the basis of *'reducing risk'* then no such limitations should be part of this legislation.
- In view of the evidence for the safety and efficacy of independent professional midwifery practice there is no justification for limitations as *'the scope of practice should only be limited where it can be demonstrated that there is a net public benefit'*. If unchanged, from July 1st 2010, there will be public *disadvantage* and legislation that was designed to protect the public from professional charlatans will instead discriminate against a significant section of the midwifery profession who chose not to accept totally unnecessary levels of control that make meaningless the very term professional. This at a time when midwife's the world over are accepting greater, government-endorsed roles in the promotion of normal birth.
- I appreciate that the requirement for insurance comes from a desire to ensure the public have redress in the case of adverse incidents. However, as drafted the legislation is contradictory and it discriminates against the profession of midwifery and the rights of women to chose who will care for them, and where, in pregnancy, birth and beyond. Restrictions concerning insurance should thus be removed or amended to prevent such discrimination from occurring, at least until such time as appropriately funded indemnity insurance is available to independent midwives.

As it stands, this Bill - ostensibly designed to protect the public - will have the effect of limiting women's access to homebirth with a know midwife and as one eminent independent midwife notes, "Australia will become one of the only countries on earth where midwives could be charged and jailed for supporting a woman to give birth at home." Please don't let that happen.

Yours sincerely,

Shona Dove