



To: National Registration and Accreditation Scheme
17 July 2009

Dear NRAIP,

Re: Exposure Draft Bill B

Overall support

Maternity Coalition supports the move to National Registration and Accreditation, and supports the exposure draft of Bill B in general.

We have some specific comments and concerns, outlined below. We also have serious concerns about what mechanisms will be put in place to support elements of the draft, in particular the requirement for compulsory professional indemnity insurance.

Professional indemnity insurance

Maternity Coalition supports, in principle, the holding of professional indemnity insurance by health practitioners, as required in the Bill B draft. However we consider it untenable that this be required of a class of practitioners who are unable to obtain insurance, in particular midwives in private practice.

The Federal Health Minister's stated intention to exclude homebirth from coverage by subsidised insurance under the Federal maternity reform agenda, threatens to interact with Bill B to result in Australian women losing access to midwifery care for homebirth. This risks denying all women a reasonable choice in birth care, which is shown by evidence to result in good outcomes at low cost, and is supported and freely available in other developed countries.

A loss of access to registered midwives for homebirth care is likely to interact negatively with the lack of protection of midwifery practice under the draft Bill B. Unregistered, uninsured non-midwife carers currently provide homebirth care to some Australian women, who are unwilling to birth in hospital, and unable to obtain care from a registered caregiver. With total loss of homebirth care by registered midwives, this practice is likely to become more common, and put more mothers and babies at risk.

We ask that the Ministers responsible for the National Registration and Accreditation Scheme work with midwifery and consumer stakeholders to find some mechanism to ensure women birthing at home are able to receive care from a registered midwife.

Possible mechanisms include:

- Exemption from the requirement for professional indemnity insurance for practitioners unable to access this insurance.
- An assurance from the Nursing and Midwifery Board that registered, insured, Medicare-accredited midwives who provide intrapartum care at home (outside insurance cover) will not be subject to disciplinary action for providing this care.
- Broadening the scope of the Federal Government's subsidy for professional indemnity insurance for Medicare-accredited midwives, to include homebirth care.

Midwife practitioner

Maternity Coalition supports the international definition of a midwife. We are concerned that the proposed endorsement “midwife practitioner” might be used to redefine the midwifery profession, and ask that this provision be removed until the profession has developed relevant models which require the title.

Inciting unprofessional conduct

Clause 148 prohibits incitement of unprofessional conduct. However, health facilities, the most likely and most harmful potential offenders, are excluded from penalty. We would like to see this exclusion removed, for the protection of consumers.

Conclusion

Our concerns relating to a move to the exposure draft of Bill B are outlined above. Thank you for the opportunity to comment.



Yours sincerely,

Lisa Metcalfe

Maternity Coalition National President