

17th July, 2009

Australian Health Ministers' Advisory Council National Registration and Accreditation Implementation Project
PO Box 2089
Woden ACT 2606

Submission:
Exposure Draft- Health Practitioner Regulation National Law 2009

Thank you for the opportunity to make comment on the above document.

As a self employed midwife working in private practice I have grave concerns of the impact the withdrawal of 'legal' private midwifery practice will have on both myself as a professional and the a childbearing woman's right of choice and their access to private midwifery services.

Removal of 'legal' private midwifery practice will deny women the right of choice with a registered qualified professional midwife with whom recent research shows homebirth is a safe option for healthy pregnant women with no obstetric or medical problems.

This study shows that planning a home birth does not increase the risks of perinatal mortality and severe perinatal morbidity among low-risk women, provided the maternity care system facilitates this choice through the availability of welltrained midwives and through a good transportation and referral system.

(de Jonge A, van der Goes B, Ravelli A, Amelink-Verburg M, Mol B, Nijhuis J, Bennebroek Gravenhorst J, Buitendijk S. Perinatal mortality and morbidity in a nationwide cohort of 529 688 low-risk planned home and hospital births. BJOG 2009; DOI: 10.1111/j.1471-0528.2009.02175.x.)

With the threat of this option of care being removed as a 'legal' option of maternity care for women who choose homebirth I am greatly concerned that a percentage of women will choose to 'free' birth without the assistance of a qualified and registered midwife, thus putting themselves and their baby at a great risk of an adverse outcome.

In the recent Hospital Profile of Maternal and Perinatal Data (Victoria) it shows a continual increase in women choosing to birth at home over the last 5 years. In 2002 there were 163 homebirths and in 2007, 254 homebirths were recorded (Consultative Council on Obstetric and Paediatric Mortality and Morbidity. Hospital Profile of Maternal and Perinatal Data (Hospital Name) for 2007. Melbourne, 2008.). This trend clearly indicates that there are more women seeking out their options of care and engaging the services of midwives working in private practice. In view of this continuing trend it is important that homebirth remains as a valid and legal option for childbearing women in this country.

The mandating of professional indemnity insurance will be discriminatory against midwives who are self employed. The exclusion of homebirth services by qualified and registered midwives raises safety concerns, I strongly urge the Australian Health Ministers Advisory Council to consider the implications of the Exposure Draft – Health Practitioner Regulation National Law 2009 as it currently stands in interest of public safety.

Therefore, I strongly recommend to the Australian Health Ministers Advisory Council and to the Health Minister that ALL midwives be provided with indemnity insurance under the new Act, enabling all midwives to provide care within the full scope of midwifery practice, including private midwifery services and homebirth.

Yours sincerely

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