

Submission:

Australian Health Ministers' Advisory Council National Registration and Accreditation Implementation Project Exposure Draft – Health Practitioner Regulation National Law 2009

17 July 2009

I write to make comment in relation to issues associated with the Exposure Draft – Health Practitioner Regulation National Law 2009. Whilst I support the proposed changes to standardise registration bodies and allow midwives access to Medicare PBS and PII, I cannot support the decision effectively making independent midwives attendance at home birth unlawful. (101. Conditions of registration & subdivision 6 General 148). I fear for the safety of some women, including myself, who despite the proposed changes to the law will continue to hold philosophical views incongruent with inpatient hospital birthing services. Homebirth will remain a birthing option, but without the safety of suitably qualified health practitioners, being midwives. I have employed independent midwives for the latter two of my three pregnancies and planned homebirths with them. I relied on these midwives to monitor my own and my baby's progress and safety in labour, a role now falling onto myself, partner and unqualified attendants in future pregnancies. I find it abhorrent I could risk penalties for inciting unprofessional conduct, or my midwives for professional misconduct by getting an independent midwife involved in a natural bodily function they are the specialist in, normal birth in any setting.

As a consumer and health care practitioner I agree it's desirable all health care practitioners be covered by Public Indemnity Insurance in order to register. But independent midwives have been unable to obtain insurance since 2001, due to their small numbers being financially unviable for insurance companies, rather than risk profile. An urgent solution is required to assist independent midwives to obtain PII, possibly via Government subsidised indemnity insurance, as has been done for other health care practitioners including obstetricians.

Thank you for your consideration of my concerns.

Yours Sincerely
Gabrielle Shine