

Submission to the Senate Finance and Public Administration Committees

Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA)

13th April 2011

I am concerned that the administration of health practitioner registrations by the Australian Health Practitioner Regulation Agency is unfairly affecting the ability of Privately Practising Midwives (PPMs) to provide homebirth services.

I have had two safe homebirths, cost-free to the government, paying privately for the services of a PPM and hope to do so again in the future.

In the last few weeks, complaints have been lodged to AHPRA against a number of PPMs in NSW, when they have transferred their birthing clients to hospital. The complaints seem to result in immediate placement of conditions on the registration of the midwife, without investigation or pending investigation, which have the effect of shutting down her homebirth service. This is unfair, unjust and unethical. It is a presumption of wrongdoing rather than innocence and it denies the midwife natural justice. No conditions should be placed on any PPM's registration before an investigation has taken place.

Indeed, if complaints are being made vexatiously, frivolously or strategically as part of the AMA's and RANZCOG's war against homebirth, those registering the complaints should face investigation or disciplinary action.

There are currently less than a dozen PPMs practicing in NSW. This already makes it extremely difficult for women seeking a homebirth to access a care provider. With such a small number of practitioners, it seems an extraordinary coincidence that there have been a series of complaints to AHPRA in such a short period of time.

As a consumer with intimate knowledge of the relationship between hospital staff and PPMs (I have recently sat as a consumer representative on the working group establishing the Royal Hospital for Women's new homebirth service), I assume that this is happening as a result of continuing well-known antagonism from hospital staff towards PPMs.

Placing conditions on a PPMs is not only ethically dubious, being a denial of natural justice and a presumption of wrongdoing. It is also dangerous, since it provides an incentive to PPMs and homebirth parents to be highly reluctant to transfer to hospital in circumstances where they may need to do so for the safety of mother or baby.

The government must not allow proper processes to be manipulated by one side of a long-running turf war.