

## **To The Senate Committee**

### **RE: ENQUIRY INTO "Administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA)"**

To Whom it may Concern,

I wish to express my dismay at the current method by which an independent midwives' registration is reviewed subject to a complaint against them.

I have brought my concerns to your attention as they relate to the following matters under your Terms of Reference:

#### ***(b) performance of AHPRA in administering the registration of health practitioners and (h) AHPRA's complaints handling processe;***

It is unfair, unjust and unacceptable that any board of review imposes conditions on a registrant prior to an investigation into allegations against them. This undermines our fair system of justice and is not in line with society's expectations of "innocent until proven guilty".

Additionally, AHPRA is taking too long to review allegations against practitioners. Independent midwives are being left in limbo for months if not years. They are unable to neither take on new clients nor confidently pursue other career paths. To live with such uncertainty is completely unacceptable.

#### ***(c) impact of AHPRA processes and administration on health practitioners, patients, hospitals and service providers;***

Conditions summarily placed upon independent midwives have a considerable and negative impact on them. They affect their professional reputation, their ability to earn an income, their standing and role in the community and their physical and mental health. The same conditions also affect the lives of the midwife's clients: parents and yet-to-be-born children alike.

My daughter was born at home under the care of a loving, caring and extremely capable independent midwife. She offered me and my wife confidence in our daughter's health and the birthing experience. We are expecting a child in the next few weeks – a child that will be born at home under the care of an independent midwife.

To know that a government registration board can remove that care from our family – for seemingly any unproven allegation – is genuinely scary. It removes the choice that my wife and I have in how our child is born. It would force me into the overburdened and medicalised hospital system or to contemplate free-birth.

***(j) any other related matters.***

The processes followed by AHPRA have stopped a local independent midwife from practicing. It has forced my wife and me to engage a midwife who is further from our house and not our first choice. Although it probably hasn't compromised our level of care it has made it harder and less certain to achieve that level of care.

The restrictions placed on this lady have removed her care from many women. Knowing we would be close to her was one of the reasons that prompted us to move to the area. We are in a rural town with a hospital but no maternity ward. AHPRA's restrictions on this independent midwife have removed the level of health service available to an entire community.

AHPRA's restrictions are based upon (as I understand) allegations from not her clients but hospital staff. They are not due (as I understand) to injury or death of a child or mother, but for reasons of protocol. This is how AHPRA treats a woman who was recently inducted on to Council's honour roll for her work in the community. That work includes supporting more than 100 women through their pregnancies and post-natal period.

Being an independent midwife is not a crime. AHPRA seems to be treating independent midwives as criminals because they operate outside the traditional hospital system. Homebirth is not a crime either. Yet I feel that parents that choose this path are being treated as outcasts and extremists because they engage an independent midwife.

Independent midwifery is being marginalised. It should be celebrated. Home birthing is being driven out of the home and into the hospital system. This is wrong and it is caused by situations such as AHPRA's handling of complaints. This causes added stress on our health system and forces people into birthing situations they are neither happy nor comfortable with.

Homebirth offers a woman choice in how she brings her child into the world. It offers her a choice in how she and her baby are regarded and cared for. An independent midwife is integral to that process, providing love, care and support that I am yet to experience in the hospital system. If AHPRA continues to manage independent midwives as it has been, that choice and opportunity will be removed from woman all over Australia.

Kind regards,

Adam Criddle.