

To whom it may concern:

I write regarding the Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA), specifically with regard to the impact of the registration process on private practice midwives who provide homebirth services.

It is my understanding that any person can make a complaint is made about a midwife to the Nursing and Midwifery Board (NMB). It is also my understanding that the NMB meets monthly and at that meeting decides whether the complaint needs to go to investigation or not.

If the Board determines that the matter doesn't need an investigation, it will automatically add a condition to the midwives registration. If it decides there is a need for investigation – which can take a significant period of time – then the Board will place 'interim conditions' on the midwives registration, which for private practice midwives offering homebirth services are "Must work only in a hospital and under supervision".

A complaints process is essential, however my concerns relate to the procedural inequity created by this system and the impact the potential delay may cause to both private practice midwives and their clients. The complaints process must be fair and equitable to all parties. While the placing of conditions is arguably to protect patients, this particular condition goes to the heart of the service provided by many private practice midwives and it is my belief that an alternative approach should be considered that enables pregnant women to continue to access the care of these highly trained and experienced professionals in the context of providing homebirth services, particularly where the complaint is potentially malicious and unjust in nature.

I have grave concerns that at any time a midwife could find their registration under restriction, particularly for an extended period of time, and this would exclude her from continuing to be a woman's primary care provider in circumstances where it is the client's express wish to engage that practitioner. This will potentially force women into a choice between the hospital system and freebirth.

This process needs to be reviewed to ensure equity and procedural fairness that does not compromise the care of women who have made an informed choice about where and with whom to birth.

Yours sincerely