

Wednesday 13th April 2011

To whom it may concern,

As a registered nurse, I fully appreciate the importance of accountability in health care and believe stringent standards need to be applied in the administration of health practitioner (HP) registrations. Unfortunately, the current system of processing complaints against HP is being abused in its use against independent midwives (IMs).

In the ongoing debate between advocates of homebirth and advocates of hospital birth only, the complaints process is being used as a tool to stop the practice of IMs assisting home-birthing women. Baseless complaints that are grounded on nothing more than a disapproval of homebirth philosophy are being rewarded, as restrictive conditions are placed on IMs pending investigation of the complaint. This results in other clients of that IM being left without a primary care provider, often close to their due date, thus forcing them into the hospital system against their will or leading them to navigate the much riskier choice of freebirth.

As a woman who has given birth both in the hospital system and at home, I found the 'risks' I encountered in hospital birth much more significant than those I faced at home with my IM. I endured inappropriate procedures in hospital, unsound practice that was not research based, and significant physical and psychological damage that was totally avoidable. None of these things resulted in the HPs involved being 'investigated', despite their consequences. In contrast, I found myself having to defend my excellent IM on many occasions through my homebirth journey, as disapproving HP in the mainstream system constantly challenged her judgement and care. Ironically, it was the homebirth that resulted in absolutely no physical or psychological damage for myself or my baby.

The current system of complaints processing is counterproductive, and creates risk and harm in the place of accountability. I believe we can devise a much more effective system of accountability and call on you to do so. I ask that you recognise the often political nature of complaints against IMs and find ways to ensure there is significant, valid grounds for a complaint before restrictions are applied to an IM's registration. I ask this as a nurse and also as a birthing woman.

Thank you for taking the time to review this submission.

Claire Johnston-Hall