Dear Mr Snowden,

**Re: Review of National Registration and Accreditation Scheme**

I am writing to support the Australian College of Midwives’ (ACM) submission for the establishment of an Australian Midwifery Board. I have attached the ACM submission to this letter.

Each profession regulated by the National Scheme has its own board apart from the nursing and midwifery professions that have the one board. The Nursing and Midwifery Board is responsible for the regulation of midwives which involves setting midwifery policy, standards and guidelines; managing midwifery registration; dealing with complaints against midwives; and assessing overseas midwives. This overview and regulation of midwifery by a dual board is no longer acceptable or beneficial to either childbearing women and families, or the profession of midwifery.

Whilst for many decades midwifery was seen as a nursing speciality, there has been an increasing recognition of the differences between nursing and midwifery. Australian maternity services and the way midwives are being educated are changing dramatically in response to consumer demand and an increasing body of national and international evidence on the benefits of midwifery models of care in meeting women’s needs and cost effective, best outcomes for childbearing women and their infants (Barclay et al. 2003; McLachlan et al. 2012; Renfrew et al. 2014; Sandall et al. 2013; Tracy et al. 2013). There has also been increasing recognition of the necessity for midwifery to be developed as a separate profession to meet the changing requirements.

As explained in the Australian College of Midwives submission to your review, midwifery must be regulated by midwives in the form of a midwifery board to ensure that:

- Midwifery practice issues are assessed and regulated by a full Board who are both credible and cognisant of the issues in the provision of contemporary, safe maternity care
- Issues associated with privately practise midwives and eligible midwives would receive attention from individuals who are appropriately qualified and experienced
- Complaints are managed in an appropriate and timely manner which includes the application of the principle of natural justice i.e. to be judged by peers who are competent to make a judgement
- Protection of the public is increased through the nimbleness of a midwifery focussed Board thus improving responsiveness to emerging issues associated with rapid escalation
- There is an increased understanding of the regulatory context for midwives in private practice providing a fee-for-service model
- Community representatives who are aware of the relevant issues for childbearing women and families are recruited to the Board thereby ensuring accurate assessment of practice-related issues for midwives
- Cost effectiveness is achieved by appropriate regulation and protection of the public
- Data collection about practising midwives is improved, which will improve workforce planning
The issue of midwifery invisibility in the legislation, and its consequences, would cease

The Nursing Board would be free of the time consuming complexities of midwifery issues and able to concentrate fully on the important issues for nursing.

Please feel free to contact me at any time if I can be of any further assistance to your review.

Kind regards,

Carolyn Hastie