10 October 2014

Dear Mr Kim Snowball,

**SAMRA Inc. submission to the review the National Registration and Accreditation Scheme for the health professions**

Thank you for taking the time to receive our feedback as a part of the review of the National Registration and Accreditation Scheme for health professions. I am writing on behalf of South Australian Maternity Reform Association Inc. (SAMRA). SAMRA is a consumer group interested in creating best practice maternity services in South Australia and Australia-wide.

Our comments primarily fall under questions 20 and 26 of the discussion paper and the following objectives and guiding principles of the National Scheme.

**Question 20. To what extent are National Boards and Accrediting Authorities meeting the statutory objectives and guiding principles of the National Law, particularly with respect to facilitating access to services, the development of a flexible, responsive and sustainable health workforce, and innovation in education and service delivery?**

**Question 26. Is there an effective division of roles and functions between National Boards and accrediting authorities to meet the objectives of the National Law? If not, what changes are required?**

The objectives and guiding principles of the National Scheme include:

- facilitating access to services provided by health practitioners in accordance with the public interest
- enabling the continuous development of a flexible, responsive and sustainable Australian health workforce
- enabling innovation in the education of, and service delivery by, health practitioners
- restrictions on the practice of a health profession are to be imposed under the National Scheme only if it is necessary to ensure health services are provided safely and are of an appropriate quality.

It is our position that a combined Nurses and Midwifery Registration board is counterproductive to these objectives and guiding principles of the National Scheme. Nursing and midwifery are separate and distinct areas of health care specialisation. As such, a combined registration board is not able to properly enable the innovation and flexibility required for the separate professions.
A qualified midwife has been trained to deliver maternity services within a defined scope of practice. A midwife is able to oversee maternity care (within the scope of practice defined) without input from a medical officer, much like a psychologist or a physiotherapist does.

Separating midwifery from nursing will more accurately reflect the separation of roles between a nurse and a midwife and will allow for the objectives stated above to be fulfilled for the maternity and midwifery workforce. Furthermore, it will promote the role of a midwife as a primary maternity service provider. This will facilitate safer and more efficient maternity service provision in accordance with the ‘National Maternity Services Plan’ (which, at its core, seeks to expand the provision of midwifery led continuity of care as the main maternity services model of care).

We see that a division of the Nursing and Midwifery registration boards will create a more effective division of roles and functions between National Boards and accrediting authorities. The Nursing and Midwifery Board is significantly the largest board with 58.4% of all registrants registered under this board. This demonstrates that there will still be adequate administrative efficiencies should the board be separated.

We recognise that there are a number of registrants who are registered as both nurses and midwives. Separating the boards will require that they are registered to one, the other or both boards. We see this as a positive as it clearly defines the distinct roles and function of nurses and midwives as separate professions.

In summary, our submission to this review is that the Nursing and Midwifery Registration board be separated to allow accreditation and registration of nurses and midwives as two separate groups of professionals.

I am keen to be informed of the outcomes of the discussion paper, specifically how our contributions are taken on board.

Yours Sincerely,

Josephine Telfer
Vice President
South Australian Maternity Reform Association Inc.