

Senate Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA)

Submission prepared by Annshar Wolfs and Jason Shorter on 13th April 2011.

Terms of Reference - In this submission we will be referring to the following highlighted points:

On 23 March 2011 the Senate referred the following matter to the Finance and Public Administration References Committee for inquiry and report by 13 May 2011:

The administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA) and related matters, including but not limited to:

- (a) capacity and ability of AHPRA to implement and administer the national registration of health practitioners;
- (b) performance of AHPRA in administering the registration of health practitioners;
- (c) impact of AHPRA processes and administration on health practitioners, patients, hospitals and service providers;
- (d) implications of any maladministration of the registration process for Medicare benefits and private health insurance claims;
- (e) legal liability and risk for health practitioners, hospitals and service providers resulting from any implications of the revised registration process;
- (f) liability for financial and economic loss incurred by health practitioners, patients and service providers resulting from any implications of the revised registration process;
- (g) response times to individual registration enquiries;
- (h) **AHPRA's complaints handling processes;**
- (i) budget and financial viability of AHPRA; and
- (j) any other related matters.

We are writing to express our dismay at AHPRA and the Nurses Board of Victoria at the wanton disregard of due process and natural justice in it's handling of the case of . is one of Central Highlands most highly valued and experienced independent private practise midwives. Our complaint is that AHPRA's failure to conduct it's investigation of in a timely manner and one that is consistent with due process has resulted in an even greater lack of birthing services for women and families in our regional community.

Speaking from a purely personal perspective as patients and referring to point (c) in the Terms of Reference above the impact of the unexplained suspension of registration came as a huge blow to us (as it did to many others in our community). Losing our chosen midwife brought unnecessary emotional stress and anxiety to our family as we spent the following months searching for a suitable replacement. We had much difficulty finding any independent midwife who was available for our due date. Also we had hoped that the matter surrounding suspension would be resolved quickly and so there was the constant thought that perhaps could attend the birth of our

second child. This unknown was also a very difficult situation to deal with, as our first choice would have been to have [redacted] present. It took until I was 37 weeks pregnant to find the birth support we needed. The impact of [redacted] suspension brought huge emotional, practical and financial strain to our family. One of the reasons for our choice to homebirth is that we believe in the positive benefits that the one-to-one care an independent midwife brings. Whilst it was wonderful finding other midwives at 37 weeks, it was also very traumatic as we did not have the time and were not able to build up the same rapport, trust and relationship that we already had with [redacted].

We are also aware of the fact that [redacted] has had her primary source of income taken without adequate explanation, without charge and without setting a date or process for resolution.

In reference to point (h) above, we wrote a letter to the Nurses Board of Victoria in June 2010 and are still awaiting a response. We find it unacceptable that 10 months on this issue is neither resolved, has a date for any such resolution process to begin, and communications have not had any response.

Thank you for your consideration of our submission. It is our hope that your inquiry will lead to fairer treatment of independent midwives by AHPRA, that there will be greater transparency and respect for due process and that this in turn will lead to better services for regional communities such as our own.

Yours faithfully,

Annshar Wolfs and Jason Shorter