

14 April 2011

The Secretary
Senate Finance and Public Administration Committee
PO Box 6100
Parliament House
Canberra ACT 2600
Australia
Email: fpa.sen@aph.gov.au

Dear Committee,

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

This submission will be focused on

(h).AHPRA's complaints handling processes

I am a midwife in private practice supporting families who choose to give birth at home.

It has come to my attention that during recent times several colleagues have either been suspended or had strict conditions placed on their registration pending an investigation into their conduct. This is punitive to the extreme and unacceptable to me, my colleagues and our clients. This process has the potential to completely destroy a midwife's reputation and livelihood without a fair judgement. At best this action is an assault on the midwife's name and practice and should be considered defamation of character.

The process of imposing conditions on midwives registrations prior to any type of investigation is slanderous. When a private obstetrician has a complaint made against him/her, he/she does not have strict conditions imposed on his/her registration whilst it is being investigated. Even in the most extreme and horrendous cases this does not occur, for example.

The National Law recognises, such a step should only be taken when the practitioner poses a serious risk to persons and it is necessary to take immediate action to protect public health or safety. A complaint put forth by disgruntled hospital staffs that have no understanding of homebirth and the relationship between woman and midwife does not constitute serious risk. On hospital transfer if a woman chooses not to comply with certain hospital procedures, it is that woman's choice and her midwife should not be punished for refusing to coerce or intimidate the woman into compliance.

Prompt review of the complaints handling process is essential for homebirth with a registered care provider to remain a valid option for women and their families. The process as it stands has the potential to eradicate homebirth with a midwife and to push homebirth totally underground.

Jo Hunter