

23 June 2014

Safety and quality framework for midwives consultation

Dear Nursing and Midwifery Board of Australia

Thank you for the opportunity to respond to the Draft revised Safety and quality framework for midwives (SQF). Eastern Health agrees that it is appropriate to revise the SQF to incorporate all midwives rather than focus on privately practising midwives attending homebirths, as all midwives have the professional responsibility to provide safe, quality midwifery care.

Generally the content of the revised SQF is helpful, clear and relevant. The document could be made clearer by including the following:

- **Section 6. Professional indemnity insurance** (dot point one). Eastern Health suggests the inclusion of the word “written” in relation to the woman giving informed consent
- **Table 1. Legislative and policy requirements for PPMs claiming exemption for PII under S284.** Under Evidence for referral pathways, a definition of “comprehensive” clinical notes would be helpful
- **Section 13. Collaborative arrangements** (last paragraph). Eastern Health suggests that the determination should allow midwives to enter a collaborative arrangement with an entire “health service” rather than a “health service team”.

Section 14. Consultation and referral. Eastern Health supports the use of consultation and referral guidelines, consistent with the Australian College of Midwives. It would be preferable, however, to have a Nursing and Midwifery Board document which is freely available to guide consultation and referral, as the Australian College of Midwives charge \$24.75 for each copy of the document (with the exception of members). This in itself may be a barrier to access and use.

Table 2. Evidentiary requirements to claim PII exemption under S284 is helpful, clear and relevant.

Table 3. Policy and legislative requirements of the SQF requires further legislative components against the final two policy rows relating to the registration standard for endorsement for scheduled medicines for eligible midwives and the NMBA prescribing formulary for endorsed eligible midwives, including:

- State and Territory drugs and poisons legislation
- Medicare prescribing authority and compliance
- Endorsement for scheduled medicines

Yours Sincerely



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