

Public consultation on the review of the Safety and quality guidelines for privately practising midwives - submission template

The NMBA is inviting general comment on the draft revised Safety and quality guidelines for privately practising midwives as well as feedback to the specific questions.

Name: __NSW Health _____

Organisation: ____NSW Health _____

Contact email:

1. Is the updated content of the draft revised Safety and quality guidelines for private practising midwives helpful, clear and relevant? Why or why not?
<p>The document is clear and includes helpful information regarding the contemporary roles of the PPM.</p> <p>The added definition of a PPM is somewhat helpful (first paragraph) although the reasoning behind excluding some employment arrangements (such as Aboriginal Community Health Services) and not others (such as employment in a private midwifery business) is not clear.</p> <p>Suggest revising the definition of a PPM given recent updates to the Medical and Midwifery Indemnity Legislation Amendment Bill (2021) and employment arrangements that are not in scope, including reasons for this exclusion.</p>
2. Is there any content that needs to be changed or removed in the draft revised Safety and quality guidelines for private practising midwives?
<p>Recommend further clarification of 'who' the guidelines are for i.e., ensure the guidelines clearly state that they are for all PPMs - endorsed, working towards endorsement, and non-endorsed.</p>
3. Is there any new content that needs to be added in the draft revised Safety and quality guidelines for private practising midwives? Why or why not?
<p>As for question 1</p>
4. Would the proposed updates result in any potential negative or unintended effects for women and families, including members of the community accessing PPM services who may be more vulnerable to harm? If so, please describe them.
<p>As for question 5</p>
5. Would the proposed updates result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples? If so, please describe them.

The exclusion of midwives working in Aboriginal Community Health Services (ACHS) could potentially disadvantage Aboriginal and/or Torres Strait Islander Peoples receiving care as the midwives working are excluded from complying to the guidelines.

It is not clear why this group of midwives is excluded.

Suggest reviewing the recent amendment bill ([Medical and Midwifery Indemnity Legislation Amendment Bill \(2021\)](#)) and any impacts on PPMs, and midwives working in Aboriginal Community Health Services might be helpful.

6. Would the proposed updates result in any potential negative or unintended effects for PPMs, other health practitioners or stakeholders? If so, please describe them.

Minor revision to enhance clarity concerning the “second practitioner”. Suggest revising the heading to “PPMs attending as the second health practitioner”

7. Do you have any other comments on the draft revised Safety and quality guidelines for private practising midwives?

Suggest further explanation of the principles concerning who is considered a PPM and who is not. This revision will support the aim and use of the guidelines.