

# AUSTRALIAN COMMISSION ON SAFETY AND QUALITY IN HEALTH CARE

TRIM: D20-148

Clinical Professor Fiona Stoker  
Chief Executive Officer  
Australian Nursing and Midwifery Accreditation Council  
GPO Box 400  
CANBERRA CITY ACT 2601

Dear Professor Stoker

## **Consultation on Review of Midwife Accreditation Standards 2014**

In response to Consultation Paper 2 of the Review of the Midwife Accreditation Standards the Commission provides the following feedback.

### **Coverage of safety and quality skills and competencies in the Program of Study**

In our letter responding to the First Consultation Paper, the Commission strongly advocated for inclusion of explicit reference to the National Safety and Quality Health Service (NSQHS) Standards. This was because the NSQHS Standards require specific sets of skills, competencies and behaviours of the clinical workforce which are fundamental to the delivery of safe, high quality care by all health professions across all health care settings.

The current draft of the Midwife Accreditation Standards requires that the program of study ensures recognition of safety and quality standards as they relate to health care but makes no further mention of many important aspects of safety and quality of care contained in the NSQHS Standards that are fundamental for professionals working in the health system. It is unclear what recognition of safety and quality standards would involve or how this would be assessed. If the Midwife Accreditation Standards do not specifically require that the program of study includes knowledge of, and competency in, the areas covered by the NSQHS Standards then the safety and quality issues that are important for midwifery – and all health care professional practitioners - should be explicitly and individually addressed. This would include teamwork and collaboration, communicating for safety, recognising and responding to clinical deterioration, partnering with consumers, evidence-based clinical practice and the prevention, recognition and management of iatrogenic injury. Mere recognition of safety and quality standards does not provide sufficient assurance that the program of study covers these important aspects of professional practice which are known to have a significant effect on the safety and quality of care that people receive in our health system.

Below is feedback provided against specific issues mentioned in the consultation paper.

### **Type and number of supervised midwifery practice experiences**

The Commission does not believe that the current requirements for supervised midwifery practice experiences should be changed. Whilst there is a trend away from unassisted vaginal birth, midwives may be the primary birth attendant for women having spontaneous vaginal births. The full scope of practice for a midwife requires experience of providing continuity of care throughout a woman's pregnancy, labour and birth. Changes to the current requirements should not be made unless there is evidence that shows that reducing exposure to these essential aspects of midwifery care will not compromise both safety and quality of care for women giving birth.

**Prescribing for graduates of an entry-to-practice midwifery program**

The Commission does not support the inclusion of educational preparation for prescribing in curricula of entry-to-practice midwifery programs. This should remain a post graduate qualification.

If you would like to discuss this response please contact:

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Senior Medical Advisor  
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Yours sincerely



Dr Robert Herkes  
**Chief Medical Officer**  
**Australian Commission on Safety and Quality in Health Care**

6<sup>th</sup> January 2020

## Accreditation standards review

### Written submission form

|                             |  |
|-----------------------------|--|
| First Name                  | Robert   |
| Surname                     | Herkes   |
| Individual or organisation? | Organisation   |
| Organisation (if relevant)  | Australian Commission on Safety and Quality in Health Care |
| Position in organisation    | Chief Medical Officer                                      |
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Standards Review

[Date]

6/1/2020