



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

13 October 2017

Ms Kate Medwin
Director, Medical Indemnity Section
MDP 951
Department of Health
GPO Box 9848
CANBERRA ACT 2061

Via email: medical.indemnity@health.gov.au

Dear Ms Medwin

First Principles Review of the Indemnity Insurance Fund

Thank you for giving the Australian Health Practitioner Regulation Agency (AHPRA) an opportunity to provide comments on the Department of Health's First Principles Review of the Indemnity Insurance Fund (IIF).

Under section 129 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), a registered health practitioner 'must not practise the health profession in which the practitioner is registered unless appropriate professional indemnity insurance (PII) arrangements are in force in relation to the practitioner's practice of the profession'.

'Appropriate PII arrangements' means 'PII arrangements that comply with an approved registration standard for the health profession in which the practitioner is registered'. Each National Board has an approved registration standard for PII arrangements.

In regard to the Midwife Professional Indemnity Support Schemes (MPIS) midwives must hold and endorsement for scheduled medicines with the Nursing and Midwifery Board of Australia (NMBA) to be eligible for access to the insurance product. As of June 2017 there are 332 midwives with the scheduled medicines endorsement. While there are small numbers of midwives who currently work in private practice they are providing services to women and their families who want to be cared for by a midwife. Discontinuing the MPIS would make this care unavailable to these women as we understand and as is stated in the Discussion paper that it is unlikely that another insurance product would be available. Under section 284 of the National Law these midwives are required to comply with the NMBA approved Safety and quality guidelines for privately practising midwives providing homebirth services (SQG). The NMBA is currently auditing privately practising midwives compliance with the SQG and will be providing a report to Australian Health Ministers Advisory Council early in 2018. Once the audit is completed the NMBA will be better placed to provide comment on any issues related to the MPIS.

We are not aware of any other issues with any of the other schemes in the IIF.

If you would like to discuss this further, please contact Chris Robertson, Executive Director, Strategy and Policy by email [REDACTED]

Yours sincerely

Martin Fletcher
Chief Executive Officer