



We support all maternity service users to navigate the system as it exists, and campaign for a system which truly meets the needs of all

Peter May
Permanent Under Secretary of State
Department of Health
Castle Buildings
Stormont
Belfast
BT4 3SQ

23rd March 2023

Dear Peter May,

We are writing to you to express our strong concern about the likely impact of the unexpected and unilateral decision by the Department of Health to withdraw the Regional Quality Improvement Authority (RQIA) Guideline for Planning to Birth at Home (2019) and the Guidelines and Audit Network (GAIN) Guidelines for Admission to Midwife-led Units (MLUs) in NI (2016, updated 2018).

We are concerned that the withdrawal of this guidance creates confusion and leaves service users without adequate information on which to base their decision-making on the important matter of choice of place of birth.

We recognise that a review of these NI guidelines was overdue. However, the abrupt withdrawal of these collaboratively-created guidelines - without consultation or a suggested timeframe for their review and reissue - is hugely concerning. From a service user perspective, we believe that this move works to change the decision-making framework in NI and yet many are not aware of this change and how it might impact on their choice of birth place, often finding themselves suddenly faced with unexpected restrictions in late pregnancy/ early labour. **We expect that the RCM will have similar concerns with regards to the difficult position this creates for maternity staff tasked with supporting women's decision-making.**

We understand the decision to withdraw this guidance was made due to a coroner's recommendation, and we are truly sorry that any family should suffer the loss of a child, no matter the circumstances. We also understand the need to review and update all guidelines and strategic documents on maternity services in NI, and look forward to being involved in that process. However, we feel strongly that it is wrong for a decision which affects so many women and babies to be made in haste, without any assessment of the impact on safety overall and without any consultation with service users or staff.

Association for Improvements in the Maternity Services
Registered Charity No. 1157845

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The two withdrawn guidelines were supported by various evidence-based studies, which demonstrate that out of hospital settings offer greater safety for mothers with no difference in the risk to babies other than a very small increase in risk for first babies born at home - which was made clear in the previous guidance. The decision to withdraw the two guidelines specific to women's choice of birth place without providing information to replace them is damaging; this is because it works to undermine confidence in the legitimacy of women's right to make her own decision about place of birth.

On the other hand, we would like to welcome the clear support in your letter to Trusts that they should follow the NICE Clinical Guideline (CG190) on choice of place of birth, but wish to raise two specific points in that context:

- first, as you will be aware, CG190 assumes a policy ambition of universal access to all four birthplace options. It recommends "Explain to both multiparous and nulliparous women that they may choose any birth setting (home, freestanding midwifery unit, alongside midwifery unit or obstetric unit), and support them in their choice of setting wherever they choose to give birth". Contrary to this, we are seeing an ongoing reduction in the number and type of institutional birth spaces in Northern Ireland, including closure of midwife led units and some obstetric units, as well as removal of support for homebirths in some areas. The consequence is that Trusts are not in a position to follow the NICE guidance to make all these choices of birthplace available. In that context, we would be grateful to know what the policy ambition is in this regard, and how and by when you expect local Trusts to align their provision with the evidence base and offer the full range of birthplace options.

As an immediate next step, it would be helpful if you would write to Trusts to remind them of their responsibility to provide all four birthplace options, and to support women in their choice, as the guideline recommends.

- Second, we would like to point out, in respect of "Medical conditions and other factors that may affect planned place of birth", that the NICE recommendation is to "Discuss these risks and the additional care that can be provided in the obstetric unit with the woman **so that she can make an informed choice about planned place of birth**" (our emphasis) - not to use them as barriers to women wishing to birth outside an obstetric unit. On the basis of information we have received, however, it appears that far from being given the opportunity for individual discussion of these factors, the birthing community in NI are having tighter restrictions placed on their options for where to birth their babies, and the information about risks and benefits is no longer transparent to families preparing to give birth here.

We very much look forward to hearing from you, and working together to ensure that the human rights of the women and pregnant people of Northern Ireland, including their rights as the decision makers in their maternity care are recognised, and that new guidelines and policies support, rather than constrain these rights. As such, AIMS will be happy to contribute as a stakeholder to any consultations on NI Maternity Strategy or new maternity service guidelines.

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AIMS is a charity that has been campaigning for improvements to the maternity services in the UK since 1960. AIMS works towards better births for all by campaigning and information sharing, protecting human rights in childbirth and helping everyone to know their rights, whatever birth they want, and wherever they want it.

As part of our work, AIMS regularly contributes as a stakeholder to consultations on NICE guidelines and has successfully influenced the recommendations and language of many of these to better support women and babies through their maternity journey. We are also a member of England's Maternity Transformation Programme Stakeholder Council, and network with other influential organisations in the birthing world, such as the Royal College of Midwives, Royal College of Gynaecologists & Obstetricians, NHS-England, NMPA and MBRRACE to name a few.

Yours sincerely

Debbie Chippington Derrick

AIMS Trustee

cc

Professor Sir Michael McBride, Chief Medical Officer

Maria McIlgorm, Chief Nursing Officer

Karen Murray, Director Northern Ireland The Royal College of Midwives

MLAs

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