



30 January 2014

Ms Ann Kinnear  
Australian College of Midwives  
PO Box 965  
Civic Square ACT 2608

Dear Ann,

**Re: Draft Position Statement on Bed-sharing and Co-Sleeping  
Consultation Paper: 20<sup>th</sup> December 2013**

The Australian Nursing and Midwifery Federation (ANMF) thanks the Australian College of Midwives (ACM) for the opportunity to comment on the *Draft Position Statement on Bed-sharing and Co-Sleeping Consultation Paper: 20<sup>th</sup> December 2013* (Draft statement).

With a membership of over 19,000 registered midwives, the ANMF through our State and Territory Branches, represents a significant proportion of practicing registered midwives in Australia.

The ANMF has considered ACM's Draft statement and Literature review. We have also considered a range of evidence and expert advice in making our comments.

The information contained in the Draft statement and in the Literature review covers several issues around mothers' and caregivers' rights to making informed choices about co-sleeping and bed sharing.

However, the ANMF cannot endorse any statement that is not wholly aligned with current expert, evidence-based guidelines. Examples of guidelines include those produced by SIDS and Kids, UNICEF UK, directives and guidelines emanating from Australian health departments, and coronial recommendations.

We consider the Draft statement should provide straightforward definitive advice and guidance to midwives. It is lengthy and would be difficult to use as a practical guide in a workplace setting. Providing practical information and guidance to midwives is critical, particularly in light of coronial criticism of the lack of consistent messages from health professionals to the public.

The ANMF is concerned that there is no clear statement of an infant's right to a safe sleeping environment, while much is made of a mother's (or other caregiver's) right to choose their preferred sleep environment.

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We note many of the sources in the Literature review are somewhat dated. More recent sources do not appear to have been considered. This is relevant as decisive and conclusive evidence in bed sharing and co-sleeping risks, along with guidelines and mechanisms to minimise those risks, have emerged, particularly since 2010. Although not exhaustive, please find attached a list of evidence gathered in the course of reviewing this Draft statement, for your interest.

The ANMF appreciates the opportunity to provide advice to the development of this draft position statement. We trust this feedback will be of use to ACM in your work. Should you require any further information, please contact Robyn Coulthard, ANMF Federal Professional Officer by telephone: (03) 9602 8500 or email: [robyn@anmf.org.au](mailto:robyn@anmf.org.au).

Yours sincerely,

A handwritten signature in black ink that reads "Lee Thomas".

**Lee Thomas**  
Federal Secretary

cc      Sarah Stewart, Policy Officer  
          Sue Kruske, President.

Encl.

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