



**Re: Discussion Paper
Services for Terminations of Pregnancy
May 2008**

The College of Nurses Aotearoa congratulates the District Health Boards of New Zealand for developing this discussion paper. The issues raised are long overdue for examination and review. It is noted that some members of the College may well not hold the views expressed here however such views have not been expressed.

Our comments on various sections of the paper follow:

- 2.1 The significant variability of services nationally is of grave concern to the College, particularly as this is not a new situation. Women throughout the country have had uneven access to services for decades. Termination services are core health service, not an optional extra.
- 2.5 The College questions the assumption on table 2, Point 6, that women may not be included as stakeholders in this project. The College of Nurses requests that this risk is managed proactively. The College is committed to sound academic research and holds the view that it is critical that women have a voice in this project as it is women who are most affected by termination services and access issues.

The College recommends that measures are taken to ensure that women are included as stakeholders, and draws attention to the many nurses of high academic standing who would be more than capable of facilitating the voice of women, while protecting their confidentiality.

Indeed, the College goes so far to say that if the decision makers could collate the stories told by women, to our members, in clinical situations, it would provide a landmark document. It could be compared with the book in which Marie Stopes, the founder of Family Planning in the UK, published the poignant letters of women who wrote to her. Quite simply – women in areas where termination services are poor, and have been for decades, are suffering an unacceptable burden, which is never heard except by the select few health professionals who provide their direct care.

- 3.1 The College notes that there are recommendations relating to the maximum fees which may be charged. While this is laudable in intent, the College notes that fees are not the sole financial cost to women. The College suggests that fees should be evenly subsidized to relieve the financial barriers for women.
- 3.2 While some travel fees are covered in document point 3.3, there are additional costs which women who live, for example, in Southland incur as they have to go to Christchurch for terminations. The additional costs of a multi day experience are a significant barrier for many women. The College of Nurses would like to see recognition of additional costs faced by women who have to attend distant services, including
- Costs of childcare
 - Costs incurred by support people
- At the very least, the cost of traveling to another city adds a significant financial burden to families who may already be financially stressed.
- 4.2 The College of Nurses would like to see acknowledgement, not only of the financial burden of this clearly unequal distribution of services, but also the more subtle issue of compromised rights to a confidential service. While the College acknowledges that termination services cannot be provided within a short distance of every woman, there are nonetheless, some glaring examples of large populations where women cannot access terminations in a confidential situation because they will have to make an overnight, sometimes a three day excursion, to have a termination. This places some women at considerable risk of coercion, abuse, exclusion, and our members have even seen violence perpetrated on women having terminations because they were unable to access the service and maintain confidentiality. This is clearly denial of a fundamental right under the Health and Disability Code.
- 4.3.1 The College supports a review of the funding formula which penalizes DHB's who exceed their estimated volumes of terminations.
- 5.1 The College of Nurses agrees with the Draft Set of Principles.
- 5.2 The College of Nurses supports all the assumptions with the exception of assumption v.
- 5.2.v. The College of Nurses disagrees with the suggestion that "DHB's may not necessary provide the service themselves". The College suggests that the minimum requirement is that all DHB's should provide first trimester terminations, rather than outsource them to another provider. The College of Nurses agrees that second trimester terminations are more efficiently situated in larger metropolitan areas.

- 5.2.vi. The College of Nurses suggests that the underlying assumption that “workforce issues will not ease in the foreseeable future” should be challenged. If first trimester terminations are regarded as a core service, then question is not ‘can it be done?’, it is rather ‘how will it be done?’
- 5.3 The College of Nurses supports Option 1.
- 6.0 The College of Nurses supports the Draft Recommendations but would like to see the inclusion of greater responsibility for providing first trimester termination services in every DHB.