



United Voice, Industrial Union of Employees, Queensland

Submission to the Health, Communities, Disability Services and Domestic and Family Violence Prevention Committee

Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2017

11 July 2017



Introduction

United Voice, Industrial Union of Employees, Queensland (United Voice) makes this submission to the Health, Communities, Disability Services and Domestic and Family Violence Prevention Committee (the Committee) regarding the *Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2017* (the Regulation Bill).

Overview of United Voice, Queensland

United Voice represents almost 30,000 workers in Queensland across a range of public and private sector employers who are engaged in a diverse range of industries and occupations, and who remain under both the State and Federal industrial relations jurisdiction.

Our membership includes school cleaners, teacher aides, ambulance officers, health professionals and operational staff, childcare workers, those employed in the contracting industries, including but not limited to cleaning, security and hospitality, private prisons and detention centres and aged care workers.

United Voice has a long and proud history of advocating for and representing the industrial interests of our members whom are employed as Ambulance Officers and Paramedics in the state of Queensland. Our members including Paramedics, Patient Transport Officers and Emergency Medical Dispatchers are on the frontline of service delivery to our community and it is important that we value the ongoing contributions they make to the health of Queenslanders. Intrinsicly, our members have always been dedicated to the health of Queenslanders, but the complexity of their roles has evolved exponentially over the past decades and for this reason, United Voice and our members welcome and support this bill.

Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2017

United Voice supports the measures and objectives contemplated by the *Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2017* as part of a national scheme which includes:

- *paramedics will be able to be registered nationally for the first time in Australia;*
- *the title 'paramedic' will be protected nationally;*
- *paramedicine will become a registered health profession;*

- *establishing minimum qualifications and other requirements for the registration of a person as a paramedic;*
- *preventing persons who are not qualified, registered and fit to practise from using the title 'paramedic' or holding themselves out to be registered if they are not;*
- *facilitating the provision of high quality education and training in paramedicine through the accreditation of training programs for registration purposes;*
- *improve transparency and accountability in the delivery of public and private sector paramedicine services.*

The role of paramedics

United Voice recognises and promotes the vital health care role that our members perform for the community. There are currently around 14,000 paramedics working throughout Australia in settings which can vary widely from ambulance services to construction sites and offshore oil rigs. In comparison to first aid officers or patient transport workers, paramedics perform higher level clinical roles, such as the delivery of rapid response clinical assessment and care in out-of-hospital settings that are often unpredictable and challenging.

Given the role of paramedics and their contribution to the healthcare system has continued to evolve and expand, so too has the level of education required of paramedics, which has similarly increased over time as their role has expanded. The skill level and complexity of the work undertaken by paramedics has developed over time to their current role as highly skilled health professionals. Historically, paramedic (health treatment) services were inextricably linked to ambulance services (transport services). The training of staff was undertaken by state ambulance organisations as vocational training. This evolved through various Diploma courses. Paramedics now have a minimum qualification of a Bachelor Degree.

The procedures undertaken by paramedics are often complex and can involve high risk interventions, including:

- specialist trained Critical Care Paramedics who respond to the most severely injured. This group can undertake additional clinical interventions including blood transfusion, field ultrasound, anaesthesia, as well as undertake surgical procedures to the chest;
- high level critical thinking and clinical judgement skills;
- undertaking invasive therapies;

- conducting procedures below the skin;
- the administration of a scheduled drug by injection;
- the supply of substances for ingestion;
- managing labour and childbirth including complicated breech deliveries;
- undertaking psychological intervention including drug therapy to treat serious disorders with potential for harm;
- acting as primary care providers without referral from registered practitioner;
- providing treatment commonly without other person present ¹.

United Voice is intimately connected to the challenges confronted by our members whom frequently work alone or in small teams, and interventions that are regularly carried out in remote locations, without the resources of a hospital emergency department:

...“unlike other health practitioners they do not have a team of allied professionals that they can easily call on at the scene of an emergency. Paramedics also work in a number of hazardous environments whether in a person's home or at the scene of an accident. Paramedics have to identify the nature of the patient's complaint, illness or injury and then apply treatment without extensive diagnostic assistance”².

Paramedics are also trusted with sensitive health care information, including patients' medical history and current medications. When necessary, they also undertake advanced paramedic care, which can include 'triage and treatment where paramedics by-pass emergency departments to access acute care facilities, such as trauma, cardiac care and stroke services'³.

Due to the life-or-death situations with which paramedics are often confronted, they may be required to perform advanced procedures, such as 'surgical thoracostomies' (involving an incision in the side of a patient's chest), that would otherwise only be performed by doctors in a hospital setting⁴.

The size of the paramedic profession provides an indication of the significant contribution paramedics make to Australian society. In 2016, the National Council of Ambulance Unions

¹ Australian Health Ministers' Advisory Council Health Workforce Principal Committee, *Consultation Paper: Options for Regulation of Paramedics*, July 2012.

² Australian Health Ministers' Advisory Council Health Workforce Principal Committee, *Consultation Paper: Options for Regulation of Paramedics*, July 2012.

³ Australian and New Zealand College of Paramedicine (ANZCP), page 6 - *Legal and Constitutional Affairs References Committee Report*, Commonwealth Senate, May 2016.

⁴ Mr Martin Nichols, Chair, Board of Directors, ANZCP, *Committee Hansard*, 20 April 2016, page 39.

estimated that 'there are currently in excess of 15,000 paramedics operating across Australia⁵. In 2013/14 and 2014/15, New South Wales (NSW) Ambulance and the Queensland Ambulance Service each responded to approximately one million ambulance emergency calls⁶.

The Australian Medical Association (AMA) stated that paramedics are regarded as making a vital contribution to the Australian healthcare system:

*"in terms of acute care or emergent care, they are a vital part of the system because they provide the skills and expertise to stabilise people before they get to hospital, prioritise care for people so that they get to the right place at the right time and initiate treatment for patients who are out in the community and acutely unwell"*⁷.

National registration for paramedics

United Voice supports the introduction of a national registration for paramedics. If enacted, this bill will ensure that our paramedics, who provide such an outstanding standard of health care in often very trying and difficult circumstances, will be regulated in the same way as many of the colleagues they work alongside, such as medical practitioners, nurses and midwives.

The case for national registration for paramedics has been argued for several years and is based on a number of reasons, including improved workforce mobility, protection of the public, and support throughout the paramedic profession.

As a result of amendments in the bill, paramedicine will become a health profession regulated by the national law. Paramedics should be subject to the same regulatory arrangements as all other health professions regulated under the national law. This includes, for example, registration processes, accreditation of training programs and national standards for entry to practice.

Paramedicine Board of Australia

Like every other profession regulated under the national law, the paramedicine profession should be regulated by a national board. To achieve this, the bill establishes the Paramedicine Board of Australia.

⁵ National Council of Ambulance Unions (NCAU)

⁶ Australian and New Zealand College of Paramedicine (ANZCP) - *Legal and Constitutional Affairs References Committee Report, Commonwealth Senate, May 2016.*

⁷ Associate Professor David Mountain, Emergency Physician Representative, Australian Medical Association (AMA), *Committee Hansard, 20 April 2016, page 11.*

Protected Title - Paramedic

Under the bill, the title of 'paramedic' will become a protected title. This will remove any confusion by ensuring only a paramedic registered by the Paramedicine Board can use the title 'paramedic'.

The measures in the bill mean the community can have confidence that the services they receive from paramedics are delivered by people who have the right training and experience and are bound by national standards set by the Paramedicine Board. This bill also promotes workforce mobility for paramedics across the country, by allowing them to register once and practise anywhere in Australia.

Australian Health Practitioner Regulation Agency (AHPRA)

We understand that once the Paramedicine Board has been appointed by health ministers, it will work with the Australian Health Practitioner Regulation Agency, also known as AHPRA, to prepare the profession for registration, which is expected to commence in the second half of 2018. One of the key functions of the Paramedicine Board will be to develop registration standards for paramedicine.

We understand that the registration standards will set requirements for professional indemnity insurance arrangements, criminal history checking of applicants, continuing professional development, English language skills, recency of practice requirements and any other matter relevant to paramedicine that the board believes is necessary. All applicants for registration as a paramedic will be required to meet the registration standards developed by the board and approved by the health ministers.

For people currently working as paramedics, the bill provides various pathways under which they can be eligible for general registration. Firstly, applicants who hold an approved qualification or a qualification that the Paramedicine Board considers to be substantially equivalent to an approved qualification will qualify for general registration. Approved qualifications will be decided by the Paramedicine Board after it is established. For the first three years after registration commences, the Paramedicine Board may approve programs of study accredited by the Council of Ambulance Authorities Inc., and published on the council's website as 'approved qualifications' which lead to general registration.

For paramedics who do not hold an 'approved qualification', the bill includes grand parenting arrangements which will allow paramedics with adequate qualifications, training or practical experience to qualify for general registration.

The paramedicine profession and its key stakeholder organisations have advocated for national registration for paramedics for many years and stakeholders have welcomed this reform. If enacted, this bill will ensure that our paramedics, who provide such an outstanding standard of health care in often very trying and difficult circumstances, will be regulated in the same way as many of the colleagues they work alongside, such as medical practitioners, nurses and midwives.

Observations

Section 311 of the *Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2017* provides for the grand parenting of qualifications for the existing paramedic workforce. The Explanatory Notes to the bill suggest that once established, the Paramedicine Board will consider which particular qualifications and experience will be acceptable for obtaining registration.

United Voice believes that it is important to ensure that all existing paramedics are properly considered in the transition to registration. Section 311 will assist in the transition, as well as having a broadly representative Board, which facilitates input from stakeholders such as United Voice on behalf of our members.

Conclusion

United Voice and our members support the measures and objectives contemplated by the *Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2017* as part of a national scheme and the delivery of the measures and policy objectives of the bill.