

SUBMISSION TO: Health and Community Services Committee
FROM: Katherine Osborne & Yvette Dempsey (QLD Speech Pathology registrants, on behalf of the 15 Gold Coast Speech Pathologists listed at the end of this submission)
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**RE: HEALTH PRACTITIONER REGISTRATION AND OTHER
LEGISLATION AMENDMENT BILL 2012**

The primary objective of the Bill is to abolish the State registration scheme for dental technology and speech pathology professions.

We wish to address the reference to the speech pathology profession in our submission. Our group would like it to express our strong *support* for the abolition of the State registration scheme for speech pathologists.

We would like to stress that we are dedicated to protecting the public from harm but we are unsatisfied with the QLD registration structure as it stands, especially while all other Australian states do not have registration. We have yet to hear of evidence that members of the public in “non-registered states” have been at more risk of harm than those in QLD. In other words, the *need* for registration has not been proven. We understand that currently there are only 2 QLD speech pathologists being monitored for “impaired” practice. We are not aware of the number of deregistered QLD speech pathologist to date, if at all.

We support the bill to abolish QLD registration because we are aware of numerous problems which we have listed below –

1. As speech pathologists living and working close to the NSW border, we have been privy to the problems created by QLD-only registration. Some speech pathologists have chosen to work in northern NSW, and not in QLD because of the additional cost and process of QLD registration. Hence we have “lost” valuable speech pathologists from the Gold Coast region, a region which is significantly undermanned, has long unreasonable waiting lists in both public and private sectors, and in which the public is desperate for speech pathology services.

2. Speech pathologists who work part-time in QLD have found it untenable to sustain both Speech Pathology Australia (SPA) membership and mandatory QLD registration. One speech pathologist said, 'I discontinued my membership with SPA as I found it difficult to maintain both registration and SPA membership whilst only working part-time. I feel I got way more from SPA membership than I ever got from the Registration Board.' Another said, “I have not been a member of SPA for the last couple of years for financial reasons, but now that registration is going, I will be joining.” We understand SPA fears that abolition of QLD registration would place QLD consumers at risk because only 850 of the 1558 registered speech pathologists are SPA members. However, we would argue that if QLD registration is abolished, there would be a dramatic *increase* in SPA membership.

3. The QLD Registration board has not permitted speech pathologists to suspend registration for 1 year of maternity leave. This has meant for some that they must either maintain registration which is an unnecessary cost or face re-entry red tape.
4. Some speech pathologists who have gained qualifications outside QLD or overseas or who have attempted to return to work after a break have endured a protracted & arguably unreasonable process. Most of these would have met eligibility for membership of Speech Pathology Australia and yet still had difficulties satisfying the criteria of the Qld Board. This disparity between the two bodies has been confusing and frustrating for some members. A number of colleagues who returned to work after a break were given a 'restricted practice' category even though their work history would not have been very different to fellow registrants. Some felt 'restricted practice' looked as though their professional competency was in question and that consumers would opt not to use their services. In addition, this is not a category recognised by our professional association and is a complication when applying for practising membership.
5. The QLD registration board does not ask members to give evidence of their continuing professional development (as does SPA for certification) nor does it do police checks on existing members so what confidence does this give to consumers?

We realise that our SPA sees QLD registration as important in the quest to pursue *national* registration, but we are not convinced retaining one will help achieve the other. If Qld registration is retained, the cost of the annual fee is likely to increase dramatically, so it seems grossly unfair to expect Qld speech pathologists to shoulder this expense when there is no guarantee it will help the national campaign. Indeed, given that the public briefing paper stated speech pathologists present a 'low or non-existent risk to the public', the benefits of registration are far from clear to us. We appreciate that some colleagues work in higher risk areas such as dysphagia, however a greater number of us do not work in those specialised fields.

Should this bill fail to be abolished, we would like to see significant changes pertaining to some of the 5 points listed above i.e. the Board accepting speech pathologists who have already gained membership of Speech Pathology Australia; the Board allowing suspension of registration for maternity leave or overseas travel for a reasonable period (e.g. 2 years); the Board not increase costs. Preferably we would like to see our professional association effect more explicit and direct measures for ensuring the public of the ethical and professional competency of its members.

Listed below are the names of Gold Coast Speech Pathologists (all QLD registrants) who have individually stated they would like their names to be placed on this submission at this point in time –

Yvette Dempsey	Katherine Osborne	Jane McFie
Karin Adams	Andrea Barltrop	Amanda Dansky
Terri-Lee Hurd	Michelle Taylor	Zoe Curtis
Tania Teitzel	Anne Butcher	Karina Waterman
Mary Hughes	Kristy Rhoades	Lyndal Mayhew