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## Submission in Response to *Health Practitioner and Other Legislation Amendment Bill 2012*

Autism Queensland is one of the largest service providers in Queensland, for individuals with Autism Spectrum Disorder. We provide a wide range of therapy and support services for these individuals, their families and support staff, in home and education settings. We currently employ 14 Speech Pathologists as part of our specialist multidisciplinary teams located in six campuses across Queensland. We offer family-centred therapy and consultation services to families and schools anywhere in Queensland, no matter how rural or remote.

We would like to raise our serious concerns regarding the Queensland Government's decision to discontinue state-based registration of Speech Pathologists in Queensland. We believe that discontinuing the state-based registration of Speech Pathologists in Queensland will result in almost complete deregulation of our profession in Queensland and put at risk the level of quality of Speech Pathology service provision to people with communication and swallowing difficulties state wide. Some Speech Pathology interventions, particularly around eating and drinking, can have serious physical and psychological health implications for individuals, if not delivered by a practitioner with appropriate expertise. It must also be recognised that swallowing interventions in particular are potentially life-threatening where the practitioner lacks the appropriate expertise.

Queensland has been a front runner in the regulation of health professionals for almost 20 years, being the only state to provide regulation of professionals and subsequent protection for the public against unethical, non evidence-informed practice in allied health service provision. We have been the only state with regulation standards in line with national regulation boards that exist in the United Kingdom (Health Professionals Council) and the United States.

We would also like to reiterate the following concerns voiced by Speech Pathology Australia, in response to this decision:

- A high number of registered speech pathologists are not members of Speech Pathology Australia and therefore will be left practising without any regulatory framework - Speech Pathology Australia can only assure the public of the ethical and professional competency standards of members - and not non-members.
- Some registered speech pathologists do so under a conditional registration, with limitations imposed on the areas or scope of practice - this cannot be regulated under Speech Pathology Australia's membership eligibility and these practitioners may not meet these eligibility criteria.
- The Registration Board has powers to assess and monitor medical conditions of practitioners that may impact adversely on their ability to practise safely and competently - Speech Pathology Australia does not have powers or mechanisms to deal with 'impaired practitioners'.
- There has been no consultation around transitional arrangements for practitioners who are currently under ethical investigations or breaches.
- There is no information around whether current health, competence or ethical concerns of certain registrants will be disclosed to Speech Pathology Australia or a relevant government body.
- Some speech pathologists currently practising in Queensland may not be able to obtain provider status with Medicare, Private Health Insurance Funds and FaHCSIA, if they cannot successfully apply for practising membership of Speech Pathology Australia.

In addition, removal of registration will make it entirely possible for the emergence of unqualified professionals operating under the title of 'Speech Pathologist,' as registration with Speech Pathology Australia is not mandatory and is not enforceable by employers.

Removing registration of the profession in Queensland will result in less protection of the public and reduced assurance of receiving a safe and competent speech pathology service.

Recent studies have found that Speech Pathology is one of the services that is most commonly used by families of children with Autism Spectrum Disorder (ASD) (Carlon et al., 2011, Interactive Autism Network, 2012; McLennan et al., 2008). Speech Pathology has also been found to be the service that families of children with ASD are most likely to want (Dymon et al., 2007).

Speech Pathologists often provide services to vulnerable client groups, particularly clients with autism and their families. Clients and families often rely heavily on the expert support, advice and intervention provided and assistance to avoid a minefield of ill-informed, non evidence-based, unethical and sometimes dangerous practices that are readily available. Therefore there is a need for protection through a legislative framework that regulates the practice and conduct of speech pathologists is crucial.

Removal of the regulatory board will also remove the need for Speech Pathologists in Queensland to commit to continued professional development. As they will have no obligation to ensure that their knowledge and practices are up-to-date, the provision of evidence-based practice to clients may be further jeopardized.

The depth and breadth of experience provided to the profession through employment of highly qualified Speech Pathologists from overseas adds to the overall continuing development of our profession. Recruitment of applicants from overseas also often enables service providers to fill speech pathology positions that have remained vacant for extended periods (such as those in rural and remote areas). Removal of the regulatory board will make employing Speech Pathologists who trained in countries other than Australia a very complex process, and will no doubt deter employers from considering these applicants, due to the time and resources involved in checking their qualifications.

The cost of continuing professional registration in Queensland would be minimal, it would seem, as the vast majority of cost would be carried by the registered members, through their annual registration fees.

We ask that our submission be considered by the committee in reference to the *Health Practitioner and Other Legislation Amendment Bill 2012*. We ask that our concerns be added to those raised, to highlight the risk that deregulation of Speech Pathology in Queensland poses to the future of high quality, safe, Speech Pathology service provision in Queensland.

Sincerely,



Penny Beeston  
Chief Executive Officer