

**From:** Jo Adsett  
**Sent:** Friday, 8 February 2013 2:50 PM  
**To:** Kallangur Electorate Office  
**Subject:** Health Practitioner Registration and Other Legislation Amendment Bill 2012

Mr Trevor Ruthenberg MP  
Chair, Health and Community Services Committee  
Parliament House  
George Street  
Brisbane Qld 4000

### **Health Practitioner Registration and Other Legislation Amendment Bill 2012**

Thank you for the opportunity of making a submission on the Health Practitioner Registration and Other Legislation Amendment Bill 2012.

In general speech pathologists work with people who are often some of the most vulnerable in our society – those who are unable to communicate effectively. Additionally, working with people who have communication impairment requires a close working relationship with the treating speech pathologist. The need to develop a close working relationship also has the potential to increase the vulnerability of consumers of speech pathology services, and therefore necessitates a strong regulatory base for the profession as is provided by registration.

**The primary objective of this Bill is to abolish the State registration scheme for the speech pathology profession. The following factors need to be considered as these items will no longer be managed through State registration.**

1. The general public has received considerable protection through State registration in Queensland. Removal of State registration poses the risk of individuals practising under the title of Speech Pathologist without appropriate qualifications, limited current experience and possible competence or ethical concerns.
2. Overseas trained speech pathologists will require assessment of the authenticity of their qualification, the content of the course completed, and their competency to use English for professional purposes and any breaches of professional conduct that may have occurred in other countries. The costs of assessing these qualifications will be borne by employers rather than being borne by the registrants as is currently the case.
3. Speech Pathology Australia is recognised by the Department of Education, Employment and Workplace Relations (DEEWR) as the assessing authority for speech pathologists intending to apply for **skilled migration** to Australia. Overseas trained speech pathologists can apply to Speech Pathology Australia to determine if they are eligible for practising membership of the association. A **successful assessment of eligibility** for practising membership does not remain valid if the applicant fails to commence practice as a speech pathologist in Australia within two years of this determination.

4. The Speech Pathology profession is constantly changing in response to new evidence regarding best practice. **Recency of practice** is of importance in a number of specialist areas such as swallowing, feeding, speech, reading disabilities, auditory processing disorder, augmentative and alternative communication (AAC), and assistive technology. State registration has a critical role in ensuring that speech pathologists returning to practice, after many years of not practising, are provided with appropriate levels of re-entry support.
5. Speech Pathology Australia provides optional Professional Self-Regulation and sets the Competency Based Occupational Standards and Code of Ethics for the profession in Australia. The association is therefore able to manage recency of practice, as well as ethical and professional competency issues through their membership criteria, however membership of Speech Pathology Australia is not mandatory. Currently only 850 of the 1,558 Queensland registered speech pathologists are members of the association. The removal of State registration will result in Queensland speech pathologists practising without any regulatory framework.
6. A number of factors such as health, currency of practice, English language competency and ethical issues are managed by the Speech Pathologists Board of Queensland through **conditional registration**. Abolishment of State registration will result in a limited ability to manage these factors and members of the public may be put at significant risk.
7. The Speech Pathologists Board of Queensland has powers to assess and monitor medical conditions of practitioners that may impact adversely on their ability to practise safely and competently. Without such assessment and monitoring, the public may be at risk of receiving services from a speech pathologist who may not be deemed to befit for practice.
8. As registered health practitioners in Queensland, speech pathologists working with children and young people do not require a blue card. Abolishment of State registration will result in speech pathologists working with children and young people needing to undertake a Working with Children check and acquiring a blue card. The cost of this process will be borne by the employing body such as the Department of Education, Training and Employment.
9. Current costing for membership with Speech Pathology Australia is \$495.00, and registration with the Speech Pathologists Board of Queensland for June 2012 to June 2013 was \$274.00.

I believe that the removal of State registration of the Speech Pathology profession in Queensland will result in increased risk to the public, reduced assurance that Queenslanders are receiving

safe, high quality, evidence based and ethical speech pathology services and potentially increased administration costs around the employment of speech pathologists by government departments and private businesses. Communication is a basic human right and to remove a regulatory process that protects the quality of speech pathology services received by those Queenslanders least able to communicate their rights will have a significant impact. We would greatly appreciate the State Government's reconsideration of the decision to discontinue State-based registration of speech pathologists in Queensland

Regards,

Joanne Adsett (Speech Pathologist)