



Dr McGirr
Chair, Committee on the Health Care Complaints Commission
Sent via: hccc@parliament.nsw.gov.au

23 September 2024

Re: Response to the Health Care Complaints Commission Review of the HCCC's 2021-22 and 2022-23 annual reports.

Dear Dr McGirr,

Speech Pathology Australia thanks the Parliamentary Committee on the Health Care Complaints Commission for the opportunity to provide feedback

Speech Pathology Australia is the national peak body for speech pathologists in Australia, representing more than 15,000 members. Speech pathologists are university trained allied health professionals with expertise in the diagnosis, assessment, and treatment of communication and swallowing difficulties.

While we are unable to provide detailed comments on operational and procedural questions (Questions 1-4 and 6-7), we wish to provide feedback on Question 5 and outline our interest in being involved with the Commission in relation to oversight of speech pathologists in New South Wales.

We provide recommendations in the following areas:

1. Enhancing the accessibility of the HCCC complaints process to better support individuals with communication needs, as well as those from culturally and linguistically diverse (CALD) and First Nations communities.
2. Establishing a formal engagement process between the NSW HCCC and Speech Pathology Australia, including the notification of upheld complaints against Certified Practising Speech Pathologists (CPSPs).

Recommendation

The NSW HCCC to enhance the accessibility of its complaints process to better support individuals with communication needs, as well as those from CALD and First Nations communities.

Question 5 of the HCCC's inquiry asks whether the services provided are accessible to the community, including Aboriginal and Torres Strait Islander peoples (referred to by the HCCC as First Nations) and culturally and linguistically diverse (CALD) communities. Speech Pathology Australia recommends that the HCCC enhances its complaints process to ensure greater accessibility for individuals with communication needs, as well as for those from CALD and First Nations communities.

Speech Pathology Australia has implemented measures within its own complaints process that include providing accessible complaint forms, accepting complaints in non-written formats, and offering direct support for individuals who need assistance with literacy skills when completing forms. Furthermore, when an Aboriginal or Torres Strait Islander person is involved in a formal complaint investigation, SPA offers for a representative who is Aboriginal and/or Torres Strait Islander to be available to support cultural safety.

In line with our commitment to high standards, Certified Practising Speech Pathologists (CPSPs) must adhere to stringent ongoing certification requirements. These include mandated hours of cultural learning each year, with an emphasis on compliance with the SPA 'Aboriginal and Torres Strait Islander Culturally Responsive Capability Framework.'

We encourage the HCCC to adopt similar practices, which could include developing communication-friendly formats, plain language resources, and staff training tailored to meet the needs of individuals with communication needs as well as those from CALD and Aboriginal and Torres Strait Islander communities. We would welcome the opportunity to discuss communication accessibility with the HCCC.

Recommendation

The NSW HCCC to establish a formal engagement process with SPA, including sharing notification of upheld complaints against Certified Practising Speech Pathologists (CPSPs).

Speech pathologists are a self-regulating profession, with Speech Pathology Australia setting and monitoring professional and ethical standards for the profession. Speech Pathology Australia is a full member of the National Alliance of Self-Regulating Health Professions (NASRHP). NASRHP's framework, which SPA's professional standards align with, is closely modelled on the National Registration and Accreditation Scheme (NRAS) overseen by Ahpra.

Complaints about speech pathologists are managed by Speech Pathology Australia (SPA). SPA's regulatory framework applies to those holding the Certified Practising Speech Pathologist (CPSP) status (members and non-members), and other speech pathologist members. SPA's authority does not extend to non-members without CPSP status. The CPSP program is voluntary and aims to protect the public, ensure high-quality healthcare, and uphold the profession's reputation.

The HCCC's recent annual report highlights the benefits and protections afforded to the public through its collaboration with Ahpra. Similarly, we believe the development of a formal relationship between SPA and the HCCC would offer significant benefits to the public by upholding the protection and maintenance of professional and ethical standards in speech pathology. We encourage the HCCC to notify SPA when complaints against CPSP-certified speech pathologists or other members of SPA are upheld. This would enable SPA to provide consistent professional oversight and ensure that the public continues to receive high standards of care from speech pathologists in NSW.

Speech Pathology Australia is keen to engage with the Parliamentary Committee on the Health Care Complaints Commission to improve health outcomes for people living in New South Wales. Please contact [REDACTED], Manager of SPA's Policy, Advocacy, and Government Relations team, on [REDACTED] or by emailing [REDACTED] if Speech Pathology Australia can assist in any other way or provide additional information.

Yours sincerely

[REDACTED]

Kathryn McKinley
National President