

24 April 2025

Hon Simeon Brown
Minister of Health
Parliament Buildings
Wellington 6160



New Zealand
Speech-language
Therapists' Association

*Te Kāhui Kaiwhakatikatika
Reo Kōrero o Aotearoa*

Tēnā koe Minister Brown,

Re: Concerns regarding the *Putting Patients First* workforce regulation consultation

I write on behalf of the New Zealand Speech-language Therapists' Association (NZSTA) to express our concern regarding the current consultation document *Putting Patients First: Modernising Health Workforce Regulation*. While we share your ambition to ensure timely, high-quality healthcare, the structure and content of the consultation make meaningful engagement difficult.

The document lacks sufficient details about the proposed changes and relies heavily on leading questions. This undermines transparency and suggests a predetermined policy direction rather than genuine consultation.

We are particularly concerned that the document repeatedly suggests that current regulatory structures limit access to services. However, no evidence is presented to support this assertion. In our view, the most significant barriers to access—particularly for speech-language therapy—are not regulatory but structural and workforce-related.

As outlined in our 2024 business case to the Government, Aotearoa New Zealand has one of the lowest ratios of speech-language therapists (SLTs) per head of population among comparable countries: 20 SLTs per 100,000 people, compared to 42.2 in Australia. This shortage has serious consequences for access to care across sectors. In education, tamariki requiring intervention can wait months for support, while people of all ages face delays of two years for assessment and provision of augmentative and alternative communication (AAC) systems. In the healthcare sector, some hospitals report no community or outreach SLT services, and lower-priority patients are frequently unable to be seen. Wait times for initial and follow-up appointments vary significantly across the country, with some areas having waitlists that exceed two years. SLTs remain virtually absent from mental health and correctional services, despite clear evidence of unmet communication and swallowing needs. The impact is particularly acute for Māori and Pasifika communities, who already experience disproportionate barriers across health, education, justice, and disability systems.

It is misleading to suggest that a change in regulation will increase access when there are insufficiently funded positions and, ultimately, training opportunities across sectors. Each year, New Zealand loses new graduates to Australia who are unable to find work here.

The NZSTA has made clear recommendations for how to build capacity, including:

- Increasing SLT training places and supporting clinical placements
- Creating more SLT roles across Te Whatu Ora, the Ministry of Education, and the wider disability and justice sectors
- Growing the Māori and Pasifika SLT workforce to meet population need; and
- Supporting graduates to remain in Aotearoa through a voluntary bonding scheme.

We urge you to reconsider the direction and quality of this consultation. What is needed is not less regulation, but strategic investment in a well-supported, culturally safe, and accessible health workforce—starting with professions like ours that are under-recognised and under-resourced despite playing a critical role in equitable, timely healthcare.

We would welcome the opportunity to meet with you to discuss how speech-language therapy can contribute more effectively to your goals for a fit-for-purpose, patient-centred system.

Please find attached our business case outlining the strategy for building workforce capacity.

Nāku noa, nā



Emma Quigan & Katrina Magirr

Co-presidents

New Zealand Speech-language Therapists' Association

Note: As a self-regulating profession, the NZSTA mirrors the robust accountability mechanisms outlined in the Health Practitioners Competence Assurance Act (HPCAA). Our regulatory processes—covering competence, ethics, complaints, programme accreditation and continuing professional development—are aligned with the public safety objectives of the HPCAA.

Our members are actively considering the future of regulation for the profession. However, no decision has been made at this stage. We await the full outcome of this review process, including the emerging options, before determining the most appropriate regulatory pathway for speech-language therapy in Aotearoa.

Cc Audrey Sonerson, Director-General of Health / Chief Executive of the Ministry of Health