

Ref: H23/90862

Gerard Hayes, Secretary  
Health Services Union  
Level 2, 109 Pitt Street  
SYDNEY NSW 2000  
Email: secretary@hsu.asn.au

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## Paramedic Ahpra registration industrial action planned by the Health Services Union

Dear Gerard,

I'm writing to ask you to please reinforce to your members that they should renew their registration with the Australian Health Practitioner Regulation Agency (Ahpra) by 30 November 2023. I have attached a letter from Mr Martin Fletcher, Chief Executive Officer of Ahpra providing information about registration renewal for paramedics.

I appreciate the contributions your union has made to the Paramedicine Workforce Forum (PWF) including developing a framework for the future of paramedicine by assessing how the profession has grown over time. I would also like to acknowledge the vitally important role paramedics play in the health system everyday and the expert care they provide to our community often at the most distressing of times. We all share the understanding that the boycott, if conducted as planned, presents a genuine risk to community health and safety across the state.

Being a registered health professional includes the responsibility of maintaining registration. Registration maintains the confidence of the public as well as protecting patients by demonstrating that health practitioners have the appropriate qualifications and meet the fitness to practice standards.

If a paramedic has not made an application for renewal of their registration by 31 December 2023, their registration will lapse, and they will no longer be able to call themselves a paramedic or hold themselves out as being a paramedic. As advised by Ahpra, this is known as 'holding out' and is a criminal offence under Health Practitioner Regulation National Law (NSW) 2009.

I am aware that your union has been advising paramedics via social media and HSU newsletters that they should refrain from renewing their registration with Ahpra as part of your campaign for an increase in wages. Consequently, the Ministry of Health (Ministry) is of the view that this is an industrial campaign.

As you will be aware under the *Industrial Relations Act 1996*, it is illegal for an employer to pay an employee in respect of time spent engaging in industrial action. During previous industrial action, difficulties in quantifying time spent engaging in industrial action has meant that paramedics received pay. In the case of non-registration with Ahpra, however, paramedics will not be able to perform duties as a paramedic and, as such, will not be paid.

I acknowledge that your union and the Ministry have engaged in genuine ongoing efforts to resolve this dispute via negotiations over the past several weeks. I wish to affirm the Ministry's willingness to continue discussions.



Yours sincerely

A handwritten signature in black ink, appearing to read 'Susan Pearce'.

**Susan Pearce AM**  
Secretary, NSW Health

23/11/23