



From the Desk of the Registrar

May 2022

Dear Regulated Members,

Legislation for the Prevention of Female Genital Mutilation (FGM) is Coming to the Speech-Language Pathology and Audiology Professions

At the time of this writing, the Government seems to be anticipating 3rd reading and then passage of Bill 10, the *Health Professions (Protecting Women and Girls) Amendment Act (2022)*, which is aimed at reinforcing existing laws that prohibit FGM. Those existing laws include the *Criminal Code of Canada*, under which performing or procuring FGM is already a criminal act. According to the information published by the Government of Alberta, when passed this legislation will apply to all regulated health professions, including SLP and audiology, to:

- ensure that health professionals convicted of performing, offering or facilitating FGM will be removed from practice or prohibited from practicing here if they migrate to Alberta from elsewhere, and
- require health colleges, including ACSLPA, to adopt standards of practice that include for mandatory education, awareness, prevention and sensitivity training for all regulated health professionals, to better support the physical and mental health of women and girls who may have undergone FGM.

Many of you will recall when the *Health Professions Act* was amended a few years ago to cover the prevention of sexual abuse and sexual misconduct towards patients. At that time ACSLPA created a new standard of practice and guidelines, and all regulated members had to complete mandatory training related to the prevention of sexual abuse and sexual misconduct. Although we did not track all of the costs to implement that legislation, I would estimate the direct and indirect costs were somewhere in the \$100,000 to \$200,000 range (or about \$60 - \$120 of your annual registration fee) plus your time for the mandatory education. I suspect this time around the costs of implementation could be as high as \$100,000 depending on what the government's implementation expectations are.

I wrote to MLA Aheer (the Bill's sponsor) and the Minister of Health expressing my solidarity with their desire to support and empower survivors of FGM through the psychological and physical trauma of this form of gender-based violence, and their goal of ensuring that no girl or woman in Alberta will ever have to undergo FGM. However, I have also expressed to them my concern that the broad scope and general nature of Bill 10 affects each health profession equally without regard for whether practitioners in the various professions might be engaged in FGM practices or be aware that they are providing services to FGM survivors who need support. My letter highlighted my belief that existing protections, which include the *Criminal Code of Canada*, the current *Health Professions Act*, and ACSLPA's existing *Standards of Practice* and *Code of Ethics*, are sufficient to address FGM-related risks in the context of the SLP and audiology professions.

I have been clear that ACSLPA specifically, and the SLP and Audiology professions generally, are not well-positioned to make a meaningful contribution to FGM prevention under Bill 10, and that there are a host of other pressing health and social matters towards which our resources and expertise could be better used. Despite MLA Aheer's very congenial follow-up to my concerns, it is expected that Bill 10 will pass 3rd reading this spring so health professionals across Alberta will likely be seeing new FGM-related Standards of Practice and possibly some form of mandatory training within the next 12-18 months. You can read more about Bill 10 if it is of interest to you at www.alberta.ca/protecting-the-health-of-women-and-girls.aspx.

Sincerely,

Michael Neth

Michael Neth,
Registrar & CEO