

16 March 2011

Mr Neil Hicks  
Chairperson  
Medical Radiation Practice Board of Australia  
GPO Box 9958  
Melbourne VIC 3001

Email: [medicalradiationconsultation@ahpra.gov.au](mailto:medicalradiationconsultation@ahpra.gov.au)

Dear Mr Hicks,

**Re: Submission to the Australian Health Practitioner Regulation Agency (AHPRA) on consultation for:**

- **Recency of Practice, Medical Radiation Practice Board of Australia;**
- **Continuing Professional Development.**

The HSUSA welcomes the opportunity to make a submission to AHPRA regarding Recency of Practice for Medical Radiation professionals.

## **HSUSA**

The HSUSA represents the interests of a diverse range of health practitioners and employees in public and private health and community service sectors. We represent members covering a broad range of skills including radiographers, pathologists, disability workers, administrative workers, mental health workers, kitchen workers, cleaners, aboriginal health care workers and personal care attendants. Our industrial achievements include fighting for better terms and conditions of employment for members including the development of career classification structures and professional development opportunities.

## **REGENCY OF PRACTICE**

The HSUSA submits that a broad approach recognising the experience and responsibility of practitioners should be adopted when considering recency of practices guidelines. The HSUASA has fought hard for career classification structures for practitioners which enables skilled practitioners to take on responsibilities not involved in regular and systematic daily practice. Workers in these roles use their practical experience to manage direct care colleagues in addition to other operational and managerial responsibilities. In this regard we submit that a broader definition of "Practice" is necessary to encapsulate skills and responsibilities of practitioners;

**Practice** means any role in which the medical radiation practitioner uses their skills and knowledge in their profession in any way that impacts on safe, effective delivery of health services. For the purposes of this registration standard, practice is not restricted to the provision of direct clinical care. It also includes working in a direct non-clinical relationship with clients, working in management, administration, education, research, advisory, regulatory or policy development roles, and any other roles that impact on safe, effective delivery of services in the profession and/or use their professional skills.

## **CONTINUING PROFESSIONAL DEVELOPMENT**

The HSUSA supports the notion of continuing professional development (“CPD”). We however, wish to express our concern regarding the proposed English standard guidelines and what seems to be a disconnect between the notion of CPD guidelines and the English practice requirements. The tenor of CPD acknowledges the broad range of activities available to practitioners to continually improve their skill set; any number of these activities can be conducted by a person who would not achieve the Board’s proposed English standard.

We have many members who have not completed their secondary education in English in one of the exempted countries but did complete their secondary schooling in English who would be required under the proposed English standard to now sit an English test. For example, there are a number of Commonwealth countries who teach in English but are not on the list of exempted countries, thus those members who were schooled in English are disadvantaged by not having completed schooling in an exempted country.

Similarly, we have many members who have either completed their tertiary education in English or who have practised in Australia for many years however, would not meet the Board’s proposed English standard. Again, any of these people can and are relied on by colleagues in the field for CPD type activities.

The HSUSA submits it would be appropriate to remove the English standard test for practitioners schooled in English regardless of country of schooling and remove the standard for those not schooled in English but who are currently practising. We submit that the imposition of an onerous English test that does not reflect the contemporary experiences of practitioners is unfair and serves to disadvantage current practitioners in the field.

Should you have any queries in relation to these submissions please contact the undersigned.

Yours sincerely,



**State Secretary**