



3 January 2012

Executive Officer  
Medical Radiation Practice Board of Australia  
Australian Health Practitioner Regulation Agency  
GPO Box 9958  
MELBOURNE VIC 3001

Dear Sir/Madam

**Consultation paper on the Draft Supervised Practice Registration Standard and consultation paper on proposed Codes and Guidelines – the Medical Radiation Practice Board**

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to respond to the Australian Health Practitioner Regulation Agency's (AHPRA) consultation papers on the *Draft Supervised Practice Registration Standard* (the Draft Standard) and the proposed *Codes and Guidelines* relevant to the Medical Radiation Practice Board (the Board).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians.

Health practitioner regulation, and its contribution to the safety and wellbeing of health consumers, is an area of considerable interest to CHF, and CHF is supportive of national registration standards. Some brief comments on the Draft Standard and the Codes and Guidelines are provided below.

**The Draft Supervised Practice Registration Standard**

CHF acknowledges that supervised practice forms a significant part of professional education and development for medical radiation practitioners. While CHF is unable to comment at this time on the specific technical requirements outlined in the Draft Standard, we generally support the development of a robust registration standard that will specify requirements for registration when supervised practice is a consideration.

**Proposed Codes and Guidelines**

CHF has previously welcomed the establishment of a National Registration and Accreditation Scheme (NRAS) for health professions, as we believe it will improve safety and quality in healthcare. We have also argued in many previous submissions that consumers must be involved in all aspects of the NRAS. A national approach to healthcare, including registration, accreditation and health complaints handling, will work towards reducing inconsistencies between States and Territories.

CHF also supports common National Board codes and guidelines including:

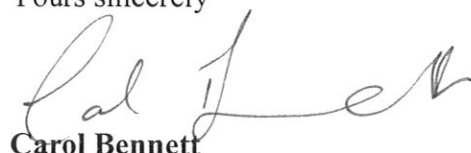
- Advertising guidelines
- Code of conduct for registered health practitioners
- Guidelines for mandatory notifications.

CHF indicated its support for the codes and guidelines in previous submissions related to the 10 health professions covered by NRAS as of 1 July 2010. As the preliminary drafts for the common National Board Codes and Guidelines were subject to public consultation prior to their implementation in July 2010 we are comfortable that they are also applicable to Medical Radiation practitioners. CHF is not aware of any profession-specific guidance that needs to be included in the Codes and Guidelines for Medical Radiation providers.

CHF considers that there is value in the registration of health practitioners involved in work that affects the treatment of consumers, to ensure that patient safety is prioritised. The Draft Standard and the Codes and Guidelines support this.

CHF looks forward to the outcomes of the consultation. Should you wish to discuss this submission in more detail, please do not hesitate to contact CHF on 02 6273 5444.

Yours sincerely



**Carol Bennett**  
**CHIEF EXECUTIVE OFFICER**