

Via Email 7/09/2011

To Whom it May Concern,

Having read the proposed guidelines for registration of medical radiation practitioners, I would like to make the following points:

1. A 60hr triennium is very excessive. Medical radiation technologists have a skills-based profession, and as such, there is nothing that can develop training and knowledge more than hours working. To expect an average of 20hrs CPD outside of work, in particular for full time workers, is unrealistic, and in my opinion counter-productive. Perhaps one suggestion could be that the more hours someone works, the less CPD they should be expected to perform, and for part-time workers, more CPD could be expected. I have worked in the UK and seen how radiographers 'fudge' their way through CPD due to the irrelevance of conferences and inservices to their day-to-day activities at work. I believe we could organise a better and more relevant system in Australia.

2. I hold grave fears that if a professional body such as the AIR gets control of a scheme like this (in particular CPD), they will exploit it to their financial advantage. This is a view held by many of my colleagues, and friends in the profession.

3. It is unclear in the guidelines whether professional indemnity insurance has to be held by an individual or can be held by a private company for their workers (as is the case with our organisation). I am assuming that this sort of 'umbrella arrangement' put in place for an organisation is appropriate.

I applaud the work done to formulate a national registrar, and believe that this is a positive step. The idea of keeping these records current and accessible will ensure better and safer work practices, and be especially reassuring in terms of hiring new staff. I do however have serious concerns (as do most of the colleagues I have discussed this with) over the amount of CPD suggested to maintain this registration.

Regards,

M. Henderson