



BreastScreen

SOUTH AUSTRALIA

A joint Australian, State and Territory Government Program

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Executive Officer
Medical Radiation Practice Board of Australia
AHPRA
GPO Box 9958
MELBOURNE VIC 3001

Dear Sir/Madam

RE: PROPOSED MANDATORY REGISTRATION STANDARDS CONSULTATION DOCUMENT

Thank you for the opportunity to comment on the proposed mandatory registration standards for the medical radiation profession.

- **Continuing Professional Development (CPD) Registration Standard**
BreastScreen SA (BSSA) is supportive of the requirement for ongoing CPD and considers that 60 hours of CPD activities over a three year cycle, with a minimum of 10 per year is reasonable.

It would be beneficial if some CPD was in the current scope of practice however meeting this requirement may be difficult for some practitioners particularly those working in rural areas. Perhaps, a statement like 'Ideally, some CPD should be dedicated to the current scope of practice' could be included however not a mandatory requirement.

AIR members are accustomed to a CPD points system however non-members who have not been involved in mandatory CPD previously may find undertaking a specified number of hours of CPD an easier system.

In CPD requirement (b) on page 6, the term discipline needs to be defined as it is unclear whether this term refers to the divisions as mentioned on page 21 (diagnostic imaging, radiation therapy and nuclear medicine) or whether it refers to diagnostic imaging specialty areas e.g. MRI, CT, mammography.

Consideration needs to be given to the CPD requirements and the process for managing CPD in special circumstances e.g. ill health, bereavement, maternity leave.

- **Criminal History Registration Standard**
Criminal History checks are already a mandatory requirement of employment at BSSA.
- **English Language Skills Registration Standard**
Good communications are essential for radiographers working in breast screening. BSSA supports this requirement.



□ **Professional Indemnity Insurance (PII) Standard**

BSSA supports the requirement for medical radiation practitioners to have in place professional indemnity insurance that is inclusive of run-off cover.

□ **Recency of Practice Standard**

BSSA primarily attracts female radiographers, many of whom are primary carers of children and/or ageing parents. Hence, for BSSA it is important that registration requirements accommodate family friendly, part time work practices as well as lifestyle choices.

Recency of practice standards must accommodate radiographers who take time out of the profession e.g. for maternity leave, child raising, health or other personal reasons. For a woman to have three years out of the workforce is not uncommon particularly if she has consecutive pregnancies or chooses to stay at home until their children are older. Returning to the workplace after three years would require re-orientation and an update in BSSA policy, but the radiographer would still have the clinical skills required to perform the role.

BSSA therefore recommends that mandatory CPD requirements are applied after a five year period of absence, not three year. This is in line with many other professions registered through AHPRA.

At times, the BSSA program has experienced difficulties recruiting radiographers. It is important that no barriers or disincentives to returning to work following long term leave are imposed as part of the registration process. The processes for practitioners to re-enter the profession must be flexible to accommodate both part-time and full time staff and accessible to urban and rural practitioners and without significant financial impost.

BSSA supports the direct re-entry programs where radiographers returning to the workforce can retrain via an Australian Institute of Radiography approved mammography course and are then granted registration conditional on employment in a mammography setting.

□ **Grandparenting and general registration eligibility registration standard**

BSSA supports the assessment process proposed for general registration under the Divisions of 1) diagnostic radiography; 2) radiation therapy and 3) nuclear medicine.

As a specialty area, BSSA does not wish to see radiographers working in breast screening lose the opportunity to return to general radiography should they want to at a later stage. If prospective staff feel that working at BreastScreen will negatively impact their employment options long term they will be less inclined to work in the Program, compromising BSSA's ability to attract and retain staff.

Hence, BSSA strongly supports full general registration for all those radiographers working in speciality areas such as mammography, CT, MRI. Endorsement of speciality areas (of radiography), similar to other professions registered by AHPRA should be adopted.

An appeals process for applicants who are not satisfied with the outcome of their application for registration or renewal is required.

Thank you for the opportunity to comment on the proposed registration standards. Please do not hesitate to contact BSSA for further comment or clarification.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Georgina Upton', written in a cursive style.

Georgina Upton
Manager, Radiographic Services
BreastScreen SA