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**Health Services Union**

**Our Ref.:** DH:DH HO.178.11

Mr Neil Hicks  
Chair, Medical Radiation Practice Board of  
Australia

**BY EMAIL**

6 October, 2011

Dear Neil

**Re: Proposed Mandatory Registration Standards**

Thank you for the opportunity to comment on the proposed mandatory registration standards for Medical Radiation Practice to apply from 1<sup>st</sup> July 2012.

The Health Services Union of WA is a union registered under the WA Industrial Relations Act. We also operate as the WA Branch of the nationally registered Health Services Union. Our membership in WA includes all Medical Radiation Practice professionals employed in public hospitals & health services, private hospitals and private practices.

We have encouraged our medical radiation practice members to make individual submissions on any or all of the draft standards and have received feedback specifically on the Continuing Professional Development CPD and Professional Indemnity Insurance standards. Our submission will deal with those two standards only.

**Continuing Professional Development**

The HSU supports the expression of CPD as hours rather than as points. Either the Standard or any guidelines issued by the Board will need to expand on the types of activities that can be counted as professional development.

Whilst the HSU supports the required CPD hours being spread over a three year cycle we are concerned that any level of mandatory CPD is more onerous on practitioners working in rural and remote health. This should be borne in mind by the Board when setting the standard. We also believe that consideration should be given to a reduced requirement for those in part time practice.

**Professional Indemnity Insurance**

All financial members of the Union are automatically covered by the HSU's professional indemnity insurance policy. This policy is underwritten by Vero Insurance Ltd and meets all the proposed minimum requirements of the Boards PII standard. For members directly employed it operates in addition to any employer insurance policy or employer self insurance.

The policy also covers members for any disciplinary matters that are commenced against the member. Members are also covered for any private practice work they may do in addition to

their paid employment provided the income derived from private practice does not exceed that earned from their paid employment.

The HSU would prefer to see some consistency in the description of the PII standards across the various professions. This is not currently the case and is not required by the Act. Nevertheless there is commonality of PII issues that would benefit from a uniform approach. The experience of the existing national boards since 2010 has led to the clarification of many issues and the Psychology Board is in the final consultation phase of revising their PII Standard prior to submission to the Ministerial Council for approval. We urge the MRS Board to consider the current Psychology PII consultation draft in their deliberations.

On the specifics of the draft PII Standard the HSU submits as follows:

- If minimum level of cover is to be specified then it should be no more than \$10 million
- If no minimum is specified then the Standard and/or any Guidelines the Board may subsequently adopt need to identify the sorts of issues a practitioner should consider in assessing their own level of risk.
- Cover by third party arrangements is supported and these include cover provided by unions, professional associations, education providers or an employer.
- The drafting of the standard needs to be amended to ensure consistent reference to all the types of third party cover.
- The last sentence in the summary should be deleted as it is incorrect. An individual policy would be taken out by an individual with the individual named in the policy. A professional body is a third party and cover provided to members does not usually specify the individual by name.

Should you require any clarification of our submission please do not hesitate to contact the undersigned.

Yours Faithfully



Dan Hill  
Secretary