

4 October 2011

Medical Radiation Practice Board of Australia  
Australian Health Practitioner Regulation Agency  
Melbourne VIC 3000

By email

Dear Ms Mutsaers,

**Re: Consultation Paper on Medical Radiation Registration Standards**

I am writing on behalf of the Services for Australian Rural and Remote Allied Health (SARRAH) to provide feedback on the *Medical Radiation Practice Board of Australia (the Board) Consultation Paper on Proposed Registration Standards* which were circulated on 30 August 2011.

SARRAH is the peak body representing Allied Health Professionals working in both the public and private sector in rural and remote Australia. SARRAH's representation comes from a range of allied health disciplines including Medical Imaging.

SARRAH is of the view that a national registration system of all Medical Radiologists across Australia is of significant importance. SARRAH is of the opinion that the community health needs across Australia will be best met by having codes and guidelines underpinning national registration standards. These standards will assist in ensuring that not only entrants into the profession are suitably qualified but professional learning and development is maintained.

SARRAH's more detailed comments are at Attachment A. SARRAH has no objection to the documents and acknowledge that our response will be made available on the Medical Radiation Practice Board of Australia's website.

SARRAH looks forward to working closely with the Board to implement the codes and guidelines which will provide guidance to practitioners.

Thank you for the opportunity to comment on this important document.

Yours sincerely,

Rod Wellington  
Chief Executive Officer

## ATTACHMENT A - SARRAH Comments

### Medical Radiation Practice Board of Australia Proposed Registration Standards

- 1.1 Hours versus points may be more subjective in measuring learning outcomes. For example some national registration bodies currently award points for approved study days where practitioners attend nationally accredited Continuing Professional Development (CPD) activities. Whilst this approach is more of an outcome measure it does not cover the whole range of CPD activities that may be usefully undertaken.
- 1.2 Learning outcomes rather than hours studied would be a better measurable module.
- 1.3 Whilst learning about current practice is useful, study within the whole range of medical radiation science activities should also be considered.
- 1.4 Exemptions would not be considered as appropriate other than long term sick leave or a career break. In such cases, a return to practice programme with CPD activities would be a suitable method rather than offering exemptions.
- 1.5 Activities such as reading journal articles, learning how to operate new pieces of equipment, learning new procedures, attending or delivering formal tutorials or presentations, attending online courses relevant to medical radiation science should be documented and logged with learning outcomes.
- 2.1 This standard is very important for patient confidence and maintaining the standard of professional behaviour.
- 3.4 No exemptions from language skills should be authorised unless the practitioner is an Aboriginal and Torres Strait Islander working in their own community. Communication is of paramount importance both with patients and the broader healthcare team. Lack of English skills could lead to unsafe practice or misunderstanding of instructions. This standard is important for maintaining patient confidence.
- 4.1 This standard would depend on level of cover, if any, provided by the employer.
- 4.2 High costing for insurance policies may be prohibitive to staff working on a casual or very part time contract. This standard may have an effect of poor recruitment and retention rates of practitioners in rural and remote areas.
- 5.1 A short update programme with relevant CPD activities would be beneficial and could be provided on line by education centres for practitioners in rural and remote areas. A short period of shadowing another Radiographer, until confident and competent may also be worth considering. This would be especially important with any new equipment.
- 5.2 Specifying a minimum number of hours may detract from part time Radiographers being available or willing to work in rural or remote areas.
- 7.2 Assessments particularly in relation to ultrasound activities should be completed on an individual basis and these practitioners are likely to have own regulatory body. X-ray operators in remote areas provide an excellent back up service, but they should not use the title Radiographer. This is inaccurate and open to confusion as to the level of skills that they formally hold. In addition X-ray operators should also be required to undertake CPD to maintain their practice skills in this area.