

Comments on Proposed Mandatory Registration Standards – Medical Radiation Practice Board of Australia.

General

The purpose of the document is not entirely clear. There is no explanation of the development of the new system, why things are being changed or the advantages of the new system. Does the new system intend to take over radiation safety matters? If so, would this be an inefficient duplication of existing regulations?

It is not clear how the registration system will fit with the existing nationally uniform radiation protection legislation in Australia. For example the new system uses the term Medical Radiation Practitioners, however, this is inconsistent with the definition in the Code of Practice for Radiation Protection in the Medical Applications of Ionizing Radiation, Radiation Protection Series (RPS) No.14, Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) 2008, which forms the basis of radiation protection legislation in Australia.

The new system seems to be only related diagnostic radiographers, radiation therapists and nuclear medicine technologists. There is no mention of radiologists, dentists or other specialists that use radiation, or medical physicists or radiation safety officers.

Registration Standard No. 1 Continuing Professional Development

The standard lacks any proposed CPD syllabus or mandatory CPD areas. If the Board wishes to consider radiation safety as part of the registration, the CPD should include a mandatory component on radiation safety. Developing technologies can have an impact of radiation safety, and lead to adjustment of current practice when using those new technologies. There should be no exemption from any radiation safety CPD requirement.

Registration Standard No. 2 Criminal History

The Code of Practice for Security of Radioactive Sources, RPS No. 11, ARPANSA 2007 requires a criminal history check by the Australian Federal Police and all State and Territory police services. Will the check made under this standard satisfy that other requirement for a criminal history check? Can they be aligned?

Registration Standard No. 3 English Language Skills

No comment.

Registration Standard No. 4 Professional Indemnity Insurance

No comment.

Registration Standard No. 5 Recency of Practice

In line with the comments on CPD, someone returning to practice after a break should undergo mandatory radiation safety training after an absence of five years or greater.

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