



Australian Government

Australian Radiation Protection and Nuclear Safety Agency

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

6 October 2011

Dear Sir/Madam

Thank you for the opportunity to comment on the proposed mandatory registration standards for medical radiation practitioners in Australia. The following relate to areas that are relevant to ARPANSA's involvement in radiation safety within Australia.

1.5: Continuing professional development.

ARPANSA believes ongoing training and enhancement in the area of radiation safety should be part of the practitioners CPD program. Such a program should have endorsement from all the state and territory radiation regulators via the Australian Radiation Health Committee. It would also provide a 'yardstick' for those jurisdictions that licence medical radiation practitioners with regard to the level of knowledge the practitioner have in the field. ARPANSA has legislative responsibilities in this area and would be interested in the development of such a program.

4.1 & 4.2: Professional indemnity insurance.

ARPANSA believes that the issue of incidents involving medical radiation should be part of a practitioner's professional indemnity insurance package. Unfortunately many of these incidents come about by errors made by operators within medical radiation practices. The identification of accidents and near-misses is a crucial element of any quality system. Appropriate reporting mechanisms need to exist and be routinely used by both the profession and the insurers. Because of the importance of incident reporting the Australian Radiation Incident Register (ARIR) was established in 1971 and is currently maintained by ARPANSA via its Safety Analysis Section. Methodologies' concerning the recognition and handling of incidents, and how to report them through the appropriate channels need to be emphasised to practitioners, as well as the relevant insuring bodies.

The register relies on the State/Territories providing de-identified data concerning the details of incidents.

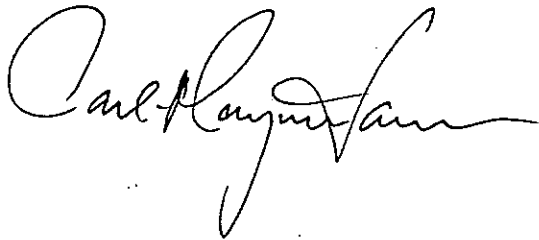
The initial objectives of the ARIR are:

- To highlight, for radiation protection authorities and users of ionizing radiation and non-ionizing radiation, specific sources, causes or procedures which give rise to a potential hazard;
- To act as a national focus for information on ionizing radiation incidents and accidents;
- Through appropriate publications, to provide feedback and guidance to users of radiation on preventing or limiting the consequences of radiation accidents; and
- To provide useful data and reports to regulatory bodies, and other advisory responsibilities
- There are different reporting criteria depending on the various modalities for example in radiotherapy the percentage deviation from a quality audit may trigger some action.

5.2 & 7.2: Recency of practice & Grandparenting

As with radiation safety training in a CPD program, any practitioner who is seeking registration with the Board via a 'Grandparenting' clause or wishing to return to the workforce should meet a minimum standard in this area. ARPANSA believes that the constant changes in technology and the complexities associated with the profession require a sound and relevant knowledge of radiation safety.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carl-Magnus Larsson'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Carl-Magnus Larsson
CEO of ARPANSA