

6 October 2011

MR80

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

Dear Sir/Madam

Medical Radiation Technologists Board of Queensland submission on the proposed mandatory registration standards to be developed in accordance with the National Law and a draft grandparenting and general registration eligibility registration standard.

The Medical Radiation Technologists Board of Queensland thanks the Medical Radiation Practice Board of Australia for the opportunity to comment on the consultation document on proposed registration standards for the profession.

After consideration of the consultation paper, it is advised the Board generally supports the proposed standards and in particular endorses the submission made by the MRPNSC in regards to registration standards.

The Board is largely satisfied with the arrangements proposed with respect to the following:

- Continuing professional Development
- Criminal History
- Professional indemnity insurance
- Recency of practice

It is suggested however, with regard to **Professional Indemnity Insurance**, that a minimum level of \$10m be set. This is a figure that is a current industry standard in indemnity insurance, for instance those covers offered by professional associations. Also, the current statute of limitation period in Queensland for a personal injury action is three years. The MRTBQ would suggest cover should extend at least three years and preferably five years. There is no run off for a public institution (i.e. the State) as such bodies exist in perpetuity.

With regard to **Recency of Practice** the MRTBQ would also comment that in a rapidly evolving profession such as medical radiation practice, consideration might be given to requiring CPD, within a specific time frame, to be mandatory after a three year absence. Dependant on the period of the absence the following additional requirements might need to be met:

- CPD
- Supervised practice
- Competency based assessment
- Academic upgrade or specific academic units for instance digital imaging, cross sectional anatomy

It is however acknowledged that in a highly feminized profession this could be difficult to achieve and administer. The provisions in the policy are considered by the MRTBQ to be adequate to achieve currency of practice.

With regard to the **proposed standard for English language skills** the Board submits as follows:

The proposed standard allows results from any of the proposed English language examinations to be obtained in multiple sittings providing these are obtained in the 12 months preceding the application and that scores are 7 or above in all four bands.

The Board does not agree with this proposal. The current policy of this Board is that results from any of the accepted English language examinations – IELTS and OET - must be obtained in one sitting. The MRTBQ would not support any variation from the registration standard accepted by the existing Australian Boards.

With regard to the proposed registration standard for **grandparenting and general registration eligibility** the Board submits the following comment:

The MRTBQ considers it unwise to consider under the Schedule of Qualifications, those Courses that have not received complete accreditation by the existing accreditation body. The MRTBQ also has noted that courses that have only been provisionally accredited are contained on the current list.

The MRTBQ also has concerns with regard to the registration of practitioners who do not hold a qualification, including 'licensed operators' who have, however, completed training in the profession that the national board considers adequate for purposes of practicing the profession. The proposed standards do not specify what the National Board would deem to be adequate for registration purposes. Clarification is sought by the MRTBQ as to what standard of training would be acceptable as adequate. The Board submits that a clause should be included such as:

"the applicant has passed a qualifying examination in the profession set by or for, or recognised by, the MRPBA ."

Should you require clarification of any of the above comments, please do not hesitate to contact myself or Ms Francesca Holloway, Professional Advisor, on (07) 3222 2808.

Yours sincerely

A handwritten signature in black ink, appearing to read "Michael Demy-Geroe". The signature is written in a cursive style with a horizontal line underneath the name.

Michael Demy-Geroe
Executive Officer