

Via Email 2/10/2011

Dear Medical Radiation Practice Board of Australia,

Just a few comments on the proposed registration standards.

1) CPD

- An established provider of a CPD program should be considered to run and audit CPD activities to save on duplication. The AIR already has a relatively user friendly CPD program that records online CPD activities and their various types and they already audit 10% of the membership for compliance. This could be done without people becoming members of the AIR. The AIR could subcontract as an accredited provider of CPD.

- Exemptions for location of practice should be considered. Regional, rural and remote practitioners are already at an extreme disadvantage when it comes to certain CPD activities such as attending conferences, workshops, seminars etc. These are due to cost, distance and for the most part the difficulty in attracting short term relief staff.

- Any cap on the number of CPD points for certain activities should also be discouraged for the same reason until the above mentioned access issues can be adequately addressed.

- Radiographer/Sonographers should have to attain CPD points of the same amount as their colleagues if they are to maintain accreditation in both.

2) Will criminal record checks have to be done at state level or federally?

3) A satisfactory grasp of the English language is a must but should that be extended to a basic level of medical language as well?

4) In regard to professional indemnity insurance the board should consider drawing on data from organisations such as the AIR or relevant unions who already provide such insurance to members.

5) Recency of practice should also extend to the elements of the workforce that have moved into administrative roles such as management to maintain their registration. For example a radiographer manager who is also a sonographer resents that he may have to do two different CPD strands to maintain dual accreditation even though he has not practiced as a radiographer for over 10 years and his department has gone to CR but he has no ideas of how CR works at all and has taken no interest in it. Should this person be able to maintain accreditation as a radiographer? Probably not.

- A grandparent clause for those who move in and out of the workforce is a good idea, however no such clause should apply to those already in our profession who have taken no interest in CPD or keeping updated with changes in technology.

Thanks for the opportunity to put forward a few ideas

Goodluck with the Mammoth task ahead.

D. Edwards MIR.