



Consumers  
Health Forum  
of Australia

16 March 2012

Executive Officer  
Medical Radiation Practice Board of Australia  
Australian Health Practitioner Regulation Agency  
GPO Box 9958  
MELBOURNE VIC 3001

Dear Sir/Madam

**Draft Guidelines on Continuing Professional Development and Draft Guidelines on Recency of Practice**

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to comment on the draft *Guidelines on Continuing Professional Development* and the draft *Guidelines on Recency of Practice* (draft Guidelines) that will apply to medical radiation practitioners from 1 July 2012.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

Although the Guidelines are not specifically targeted at consumers, CHF has reviewed both documents in terms of how they might impact upon the safety and wellbeing of health consumers. Overall, we are broadly supportive of the documents. Some comments are provided below.

***Draft Guidelines on Continuing Professional Development***

CHF supports the need to provide health professionals with clear guidelines on how to develop and maintain their clinical and non-clinical skills and knowledge in order to maintain a high standard of health care. We support the draft Guidelines on the basis that the underlying principles appear sound and are consistent with the continuing professional development requirements of other comparable professions.

***Draft Guidelines on Recency of Practice***

CHF notes there are some differences between the draft Guidelines and the document that was previously in place, i.e. the *Recency of Practice Guidelines for Medical Radiation Practitioners*, which was developed by the Medical Radiation Practitioners Board of Victoria. We note there is a difference in timeframes before an applicant returning to practice is required to submit a plan to their respective Board outlining further training they plan to undertake before they are fit to return to practice. The Draft Guidelines under consideration

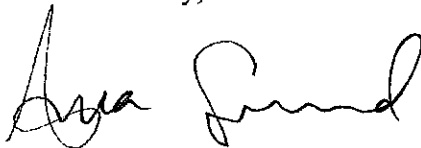
set a timeframe of between *three* and five years, while the guidelines developed for use in Victoria set a timeframe of *two* to five years. In our view, if a practitioner has been not been practising for at least two years, this would warrant a requirement for them to demonstrate to the Medical Radiation Practice Board of Australia (the Board) that they are competent to practise, as there may have been significant clinical and technical developments in their absence.

CHF notes that practitioners have to address issues such as skills and knowledge, education and mentoring in areas such as technical competency, clinical proficiency and patient communication and management in order to demonstrate to the Board their competence to practise. It would be useful if the relevant standards/competencies developed for this purpose are attached to the form and made available on the Board's website. This would provide greater transparency for consumers who wish to refer to this information.

Furthermore, we note that applicants must provide evidence demonstrating the extent of their experience in clinical practice, which could include a recent resume. In our view, this should also be supplemented by a supporting letter or contact details of people who are able to verify this experience.

CHF welcomes this opportunity to provide feedback on both of the draft Guidelines. Should you wish to discuss any aspect of these comments further, please contact CHF Policy Officer Ms Dewi-Inala Zulkefli.

Yours sincerely,



**Carol Bennett**  
**CHIEF EXECUTIVE OFFICER**