

# DRAFT GUIDELINES FOR MEDICAL RADIATION PRACTITIONERS

## *Consultation Response from the Australian Institute of Radiography*

The Australian Institute of Radiography (AIR) welcomes the opportunity to respond to the draft guidelines paper on Continuing Professional Development for Medical Radiation Practitioners.

### **Introduction**

The Health Practitioner Regulation National Law Act 2009 will apply to Medical Radiation Practitioners from 1 July 2012. The AIR finds it helpful to refer back to this Act in making any submission on matters under the Act, as that provides the basis for the existence of the MRPBA.

The objectives and guiding principles of the Law are to establish a national registration and accreditation scheme for—

- (a) the regulation of health practitioners; and
- (b) the registration of students undertaking—
  - (i) programs of study that provide a qualification for registration in a health profession; or
  - (ii) clinical training in a health profession.

(2) The objectives of the national registration and accreditation scheme are—

- (a) to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered; and
- (b) to facilitate workforce mobility across Australia by reducing the administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction; and
- (c) to facilitate the provision of high quality education and training of health practitioners; and
- (d) to facilitate the rigorous and responsive assessment of overseas-trained health practitioners; and
- (e) to facilitate access to services provided by health practitioners in accordance with the public interest; and
- (f) to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.

(3) The guiding principles of the national registration and accreditation scheme are as follows—

- (a) the scheme is to operate in a transparent, accountable, efficient, effective and fair way;

(b) fees required to be paid under the scheme are to be reasonable having regard to the efficient and effective operation of the scheme;

(c) restrictions on the practice of a health profession are to be imposed under the scheme only if it is necessary to ensure health services are provided safely and are of an appropriate quality.

These then are the objectives and guiding principles against which this guideline should be measured.

### **Background to Submission**

This submission is requested by the Medical Radiation Practice Board of Australia (MRPBA) under s. 39 of the *Health Practitioner Regulation National Law (2009)* (HPRNL). Section 39 deals with Codes and guidelines and states that a National Board may develop and approve codes and guidelines—

(a) to provide guidance to the health practitioners it registers; and

(b) about other matters relevant to the exercise of its functions.

The MRPBA advise that this guideline:

- supplements the requirements set out in the Board's registration standard for Continuing Professional Development (CPD)
- supplements the requirements set out in the National Law at ss.128 and 109(1)(iii) in relation to practitioners obligations to undertake CPD and to advise the Board when applying for renewal of registration that the Board's CPD requirements have been met
- provides guidance to practitioners in relation to a matter of professional practice, not set down in the legislation or a registration standard, which can be used in proceedings under the National Law Act as evidence of what constitutes professional conduct or practice for practitioners under s. 128(2) of the National Law.

Registered practitioners, in accordance with the Board's CPD registration standard, are required to complete 60 hours of CPD activity over a three year period (triennium). Alternatively a practitioner may undertake a CPD program approved by the Board. The AIR has written to the Board requesting approval for the AIR CPD programme to be an approved programme under this alternative.

The Commencement date of the first CPD triennium will be 1 July 2012. To align with the registration renewal period, the first year of the CPD triennium will continue until 30 November 2013, a period of 17 months. The first CPD triennium will finish on 30 November 2015.

The MRPBA acknowledges the tensions between pressure to pursue education and development while meeting the demands of delivering services to patients. In recognising this tension, the MRPBA has endeavoured to ensure that the requirements of the CPD Registration Standard are achievable and sufficiently flexible so as to accommodate individual practitioner circumstances.

Practitioners are best placed to determine the most appropriate activities for their continuing professional development. To comply with the MRPBA registration requirements, practitioners must ensure that their self-directed CPD program is:

- Relevant – a majority of CPD activities must be directly relevant to your area of practice and the definition for Substantive CPD is provided
- Varied – the Board recommends that practitioners undertake a variety of activity types and, where possible, include some CPD activities that involve interaction with peers. Engaging with other professionals on mutual areas of interest can provide valuable learning regarding professional and clinical matters.
- Includes reflective practice – CPD activities should incorporate a degree of reflective practice, which requires a practitioner to analyse experiences in order to learn from them, and record the learning's
- Properly documented – for all CPD undertaken—the practitioner must maintain detailed and verifiable records which may be audited by the Board.

At all times, whether as self-directed or as part of an approved CPD program, it is the responsibility of the practitioner to assess potential activities for suitability and relevance and to determine whether individual learning needs will be addressed by undertaking these activities.

In all these respects the AIR is supportive, the more so when looking at the Substantive and General examples of CPD provided by the Board. These accord fully with those outlined and required by the AIR in this professions mandatory CPD programme. Indeed one could suggest that the AIR CPD outline was the basis for that developed and suggested here,

Where the AIR does disagree with the MRPBA is in the measurement of CPD by hours. It is the view of the AIR that such a structure lacks the capacity to recognise the depth of CPD generally undertaken by members of the profession. From the history of a number of audits now completed the AIR is able to confidently report that members and users generally complete significantly more by way of CPD in either hours or points. The AIR would also report to the MRPBA that the recent membership survey showed that 68.9% of members of the AIR preferred recording CPD by points.

For this reason the AIR is currently restructuring our existing programme so that the minimalist level of record of CPD will equate to the 60 Hours per triennium (with a minimum of 10 hours per year) required by the MRPBA. The AIR will also empower our members and users to continue to record greater amounts of CPD and reward those who achieve a standard which equates to the current average which is 90 -99 points against the required 30. 60% of AIR members and users lodge between the current 30 points minimum under our programme and 100 points and a further 21% consistently log up to, or over, 300 points.