



28 March 2013

To: The Executive Officer,
Medical Radiation Practice Board of Australia,
AHPRA

Thank you for the opportunity to comment on the **draft Supervised practice registration standard**.

We are responding on behalf of the department of Radiation Therapy Services (RTS), Peter MacCallum Cancer Centre. Our relevant experience and background are as follows:

Claire Fitzpatrick, Director (acting): Claire was directly involved in a leadership role in the transition from the Diploma to a Bachelor level course for Medical Radiation Sciences in Victoria in the mid 1980s with a particular interest in the Radiation Therapy program. As manager of the largest radiation Therapy Department in Australia, Claire has significant experience and knowledge with regard to student and intern (NPDP) education programs and the standards required for the employment of registered radiation therapists.

Kate Wilkinson, Research Unit RTS: Kate has been involved in managing the Education and Development Unit of RTS since 1990, with particular experience in assessing, coordinating and developing programs for radiation therapy students, interns (PDY, NPDP), returning practitioners and international radiation therapists undertaking periods of supervised practice. She holds post graduate qualifications in clinical education, supervision and training and professional practice learning

Glenn Trainor, Head (acting), Education and Development Unit, RTS: Glenn has held senior clinical educator positions in our department since 2004 and is now responsible for the leadership and management for all learners across all sites of RTS, Peter Mac. His experience managing professional practice learning is similar to Kate's. He holds postgraduate qualifications in clinical education, supervision and training and professional practice learning.

OPTION ONE – MAINTAIN 'AS IS'

This is the only option we support.

The draft consultation paper does not provide any evidence, research or scholarly foundations to substantiate that the current system may be insufficient. We recommend that the Board considers implementing an independent expert analysis of the existing programs, with consultation with all stakeholders, to establish any need for revision or changes to the status quo.

In our experience, the AIR's accreditation systems for MRS courses and supervised practice requirements have met individual and organisational needs as well as upholding the safety of patients and the public and professional practice quality standards. It would be helpful to understand why the MRPBA is seeking changes to the AIR's established programs.

Our experience with Victorian programs of Radiation Therapy courses:



1. Bachelor level course for the radiation therapy profession in Victoria (and interstate) with a PDY or NPDB year of supervised practice

In 1986, RMIT University moved to a Bachelor level degree course for the medical radiation professions in Victoria. In consultation with the AIR and the clinical centres, including the RTS department of Peter Mac, it was agreed that a year's supervised practice after the awarding of a degree was required to achieve a Statement of Accreditation from the AIR to be eligible to be a fully qualified radiation therapist. The degree courses (UG1 level) required a mandated amount of academic time which resulted in a significant reduction of clinical placement (supervised practice) within the three-year course compared with previous diploma level courses. The introduction of a 12 month (48 week) Professional Development Year (PDY) was to retain a similar amount of clinical supervised practice to ensure provisionally accredited practitioners would gain sufficient experiential learning opportunities to support patient safety and professional practice standards once qualified.

Our experience, over 25 years, is that graduates from the UG1 level courses in Australia and who have successfully achieved the AIR's PDY or NPDP are capable and competent professionals and we continue to employ them in our department. Additionally, many radiation therapist who have undertaken their PDY or NPDP year at RTS Peter Mac, have been employed interstate and overseas and they are well-regarded professionals.

2. Graduate Entry Masters in Radiation Therapy (Monash University).

Radiation Therapy Services, Peter Mac, was one of the partners implementing Monash University's GEM in Radiation Therapy in 2003/4. This is a two year (6 semesters) course which requires a Bachelor degree in a relevant area as a pre-requisite. In implementing this course, the clinical centres and the AIR ensured that the clinical practice components of the course were on a par, as far as the amount of time, with the Bachelor degree/NPDP course. The final 12 months of the course is effectively a full-time supervised practice placement with the academic component of the course conducted online. On successful completion of the 2 year course, graduates are eligible for registration with the MRPBA and to practice as a fully qualified radiation therapist.

RTS Peter Mac has close to ten years experience of employing graduates from the GEM course and we find them to be both competent and capable and highly regarded professionals. As with registered professionals through the Bachelor + 12 months PDY pathway, many of our GEM RTs have successfully worked interstate and internationally and with the high regard of their employers.

Because of the consistency and high quality radiation therapists developed through these programs, we support Option 1 outlined in the draft standards document.

OPTIONS 2 AND 3 OF THE CONSULTATION PAPER

We are unable to offer comment on Options 2 and 3 as the intent/arguments are not clearly elucidated. Thus, we cannot adequately consider alternatives to the current arrangements to become eligible for registration as a radiation therapist with the MRPBA.



We ask that the Board provides more information and detail, including supporting evidence from recent professional practice literature, to explain and justify the promotion of these options.

DEFINITION OF SUPERVISED PRACTICE

The draft consultation paper does not include a definition of “supervised practice”. Therefore, we have had difficulty in our consideration of the consultation paper because of uncertainty with regard to terminology and its meaning.

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