

Public consultation on draft registration standards

2 May 2014

Responses to consultation questions

Please provide your feedback as a word document (not PDF) by email to medicalradiationconsultation@ahpra.gov.au by close of business on 30 June 2014.

Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

Organisation name
SA Health
Contact information <i>(please include contact person's name and email address)</i>
R. Chapman (email removed for privacy reasons)

Your responses to consultation questions

Registration standard and guideline: Recency of practice (RoP)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
1. From your perspective how is the current RoP registration standard and guideline working?	From my perspective it is working well. The definition of "practice" is clear and easy to define within my own current working situation.
2. Is the definition of clinical practice appropriate for the purpose of demonstrating recency of practice?	Yes.
3. Is the requirement for 450 hours of practice in the past three years sufficient for practitioners to competently and safely provide services to the public?	Yes
4. Is the content and structure of the draft revised RoP registration standard and guideline helpful, clear, relevant and more workable than the current standard?	No. There has been a new term "clinical practice" introduced within the revised standard. It is unclear what is meant by "clinical practice". I currently work in a non-clinical role, as a consultant for my profession on an IT project. As it stands, I can easily identify that I fulfil the recency of practice standard. Under the new proposed standard, I am not sure if I would be able to maintain my registration as I do not undertake "clinical practice".

Registration standard and guideline: Recency of practice (RoP)

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To me, this means that if I wish to return to clinical practice, I would not be able to do so without undertaking a return to practice plan (once it has been longer than 3 years – or less than 450 hours of clinical practice). Therefore I question the point of even maintaining my registration when I am working in a non-clinical role in my profession.

5. Is there any content that needs to be changed or deleted in the draft revised RoP registration standard and guidelines?

Under point 41. Of the document, you state “The proposed revised standard now includes a requirement to undertake a minimum of 450 hours of **practice** in the past three years for those medical radiation practitioners undertaking clinical practice.” However in the “option 2” wording this is “include a minimum number of **clinical practice hours** in the past three years for those medical radiation practitioners undertaking clinical practice.”

6. Does the proposed five year maximum period within which to undertake a review of the standard provide a reasonable balance between stability and the flexibility required to revise and update the standard if necessary?

Yes

7. Is there anything missing that needs to be added to the draft revised RoP registration standard and guidelines?

You need to clarify what is meant by “clinical practice” and also define whether you mean 450 hours of “practice” or 450 hours of “clinical practice”.

8. Is the information provided in the guideline clear and useful?

Yes.

9. Do you have any other comments on the draft revised registration standard?

No.