



17 April 2019

Mr Mark Marcenko
Chair
Medical Radiation Practice Board of Australia

By email: medicalradiationconsultation@ahpra.gov.au

Dear Mr Marcenko

I refer to the Medical Radiation Practice Board of Australia's public consultation on the draft revised professional capabilities for medical radiation practice.

In summary, the National Health Practitioner Ombudsman and Privacy Commissioner (NHPOPC) supports the Medical Radiation Practice Board's revisions to the professional capabilities for medical radiation practice, with no suggested changes to content.

Role of the NHPOPC

The role of the NHPOPC is to provide ombudsman, privacy and freedom of information oversight of the Australian Health Practitioner Regulation Agency (AHPRA) and the 15 National Health Practitioner Boards (National Boards), including the Medical Radiation Practice Board.

My office handles complaints and, where appropriate, conducts investigations into the administrative actions of AHPRA and the National Boards in order to assist people (both members of the public and health practitioners) who are dissatisfied with the way a matter has been handled. My office also works with AHPRA and the National Boards to address systemic issues which have been identified during the course of our complaint handling activities.

Overview of NHPOPC complaints data

The NHPOPC recorded 794 approaches during the 2017–18 financial year. This was the NHPOPC's busiest year to date, with 24% more approaches in comparison with 2016-17.

After assessment, 444 of the approaches were recorded as complaints about AHPRA and/or one of the National Boards. Only three of the 444 complaints were about the Medical Radiation Practice Board. This is consistent with the number of complaints received about the Medical Radiation Practice Board in 2016-17 and it is therefore pleasing to see that the number of complaints about the Medical Radiation Practice Board did not increase in 2017–18.

A review of the complaints received about the Medical Radiation Practice Board from 2016–17 to 2017–18 show that:

- five complaints concerned issues with registration (three from overseas practitioners seeking registration in Australia and two from practitioners regarding conditions imposed on their registration)
- one complaint was made by a notifier about the handling of a notification.

Common themes in the registration complaints included delay in finalising matters and incorrect information being provided to applicants.

Three of the six complaints proceeded to an investigation by the NHPOPC. Of these three complaints:

- two were finalised when the NHPOPC provided formal comments/suggestions for improvement to AHPRA about the handling of the matters
- one complaint was resolved when our office provided a further and better explanation to the complainant about the issue that led to their complaint.

Draft revised professional capabilities for medical radiation practice

In 2016–17 and 2017–18, none of the complaints received by the NHPOPC related directly to the professional capabilities for medical radiation practice. Based on this, we are unable to provide comments about complaint themes in relation to this particular area.

However, the NHPOPC generally supports the proposed revisions to the professional capabilities for medical radiation practice. This is because the revisions more accurately set out the level of capability required for safe and competent practice, reflect the evolving nature of professional practice, align medical radiation practice in Australia and New Zealand, and also remove duplication. On this basis, it can be anticipated that the revisions will strengthen the understanding of professional medical radiation practice. This will be beneficial to medical radiation practitioners (in relation to the threshold level of professional capability to obtain and maintain registration), education providers (in relation to a framework for assessing student and practitioner competence) and the community (in relation to the standard they can expect from medical radiation practitioners).

The NHPOPC also agrees that consistent guidance on cultural safety and cultural competence in practice across the regulated health professions is beneficial. Although the NHPOPC currently has minimal relevant complaint data in relation to culturally safe and respectful practice, we support the Medical Radiation Practice Board's proposed content.

It is clear from the consultation documentation that the Medical Radiation Practice Board has put significant work into the consultation paper, proposed revision to professional capabilities for medical radiation practice and fact sheets for education providers and clinical supervisors. The NHPOPC has no further comments but applauds the efforts of the Medical Radiation Practice Board to improve the professional capabilities for medical radiation practice to the benefit of practitioners and the community.

Thank you for the opportunity to comment.

You are welcome to contact this office on 1300 795 265 or by email via complaints@nhpopc.gov.au if you require any further information.

Yours sincerely



National Health Practitioner Ombudsman and Privacy Commissioner