

Attachment B: Public consultation response template

March 2025

Consultation questions on updated professional capabilities for medical radiation practitioners

The Medical Radiation Practice Board of Australia is conducting a confidential preliminary consultation on updated Professional capabilities for medical radiation practice. The Board invites your feedback on the proposed updated Professional capabilities using the questions below.

Please provide your feedback on the questions in a **Word** document (not PDF) by email to medicalradiationconsultation@ahpra.gov.au by **5pm (AEDST) Wednesday 28 May 2025**.

Stakeholder details

If you would like to include background information about your organisation, please do this in a separate word document (not PDF).

Organisation name
Australasian Institute of Digital Health (AIDH)
Contact information
Please include the contact person's name, position and email address
Simon Tatz, General Manager, Policy and Advocacy, and Workforce Management

Publication of submissions

The Board publishes submissions at its discretion. We generally publish submissions on our website in the interests of transparency and to support informed discussion.

Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions designed to protect personal information and information given in confidence.

Please let us know if you do not want us to publish your submission or would like us to treat all or part of it as confidential.

Response to consultation questions

Consultation questions for consideration

Please provide your responses to any or all questions in the blank boxes below. If you would like to include your response in a separate word document, please provide this in word format only (not a PDF)

1. Is the content of the updated *Professional capabilities* clear and reflective of autonomous and contemporary medical radiation practice? If no, please explain why.

AIDH welcomes that the Board:

- acknowledged the critical importance of understanding health data, emerging technologies (including artificial intelligence), and digital health for medical radiation practitioners – in brief, the importance of a digitally enabled workforce;
- added digital health capabilities, data management and health informatics to support the provision of care to the updated *Professional capabilities*; and
- referred to the Australian Digital Health Capability Framework to develop the key capabilities of Use of Health data, Digital health systems and Use of Health informatics.

We also welcome the acknowledgement that digital determinants of health can exacerbate health literacy issues.

We acknowledge the Board's note that 'updated guidance on minimum capabilities for medical radiation practitioners with respect to Digital Health including Artificial intelligence may be published by the Board within the lifecycle of the *Professional capabilities*.'

We recommend that the Board consider developing a framework specific to medical radiation practitioners, similar to the frameworks that were developed for the nursing and midwifery, and for the allied health professions (both frameworks are available at <https://digitalhealthworkforce.org.au/strategies-frameworks/>).

We would welcome working with the Board on such a project.

2. Is there any content that needs to be changed, removed or added in the updated *Professional capabilities*? If yes, please provide details.

It is our view that the Board has satisfactorily adopted AIDH recommendations to Ahpra's consultation on draft guidance for professional capabilities (available here: https://digitalhealth.org.au/wp-content/uploads/2024/12/FINAL_AIDH_PUB_sub_Ahpra-draft-guidance-on-professional-capabilities.pdf) and our recommendation that some formative level digital health capabilities should be integrated by the industry in their own right, and other ADHCF capabilities could be assimilated within other professional capabilities.

Reminder, the recommendation was to:

1. Adopt as standalone Digital Health capabilities:

A2 – Procedural Knowledge - Use of digital tools in healthcare in a way that aligns with procedural, policy, legal and ethical requirements

D1 – Information Sources - Understanding the range of health information/data sources available and how and why these may be linked and analysed D2 – Reasoning and Evaluation - Evaluation of data and use of critical reasoning to provide information to support decision making and informed use of digital health applications E1 – Appropriate Technologies - Understanding the variety of digital health technologies available and identifying appropriate options E2 – Digital Health Controls - Understanding and demonstrating the use of effective controls to ensure safe and appropriate application of digital health 2. Integrate into other professional capabilities: B3 – Leadership through digital change - Embracing the future of digital health through engaging with emerging technologies, accepting change, and participating in decision making C1 – Quality in Data Capture - Understanding own role in data capture and ensuring the collection of accurate information C2 – Use of information - Understanding how health information may be used and applying this as relevant to own role C3 – Data integrity for Decision Making - Understanding the importance of data integrity and how data and information translate to real-world action and change Further, we recommend that the Board add an enabling component about the need to maintain currency of skills and knowledge with digital systems and tools (this could be added to Domain 1 Key Capability 5). We note that Domain 1 Key Capability 5 makes specific references to Artificial Intelligence (AI) as it relates to bias, regulation and national frameworks for safe use. Those aspects are not specific to AI and can apply to digital health systems and tools in general. As the Board noted in its 2022 Statement on Artificial intelligence, medical radiation practitioners work with AI across a broad range of clinical and non-clinical roles. The statement mentions a number of aspects that medical radiation practitioners need to be across. There is an opportunity for the Board to add a Key capability specific to AI to address matters such as understanding inputs and outputs.	3. Would the updated <i>Professional capabilities</i> result in any potential negative or unintended effects for people requiring healthcare, including members of the community at risk of experiencing poorer health outcomes? If yes, please explain why.
NA	
4. Would the updated <i>Professional capabilities</i> result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples? If yes, please explain why.	
NA	
5. Would the updated <i>Professional capabilities</i> result in any potential negative or unintended effects for medical radiation practitioners? If yes, please explain why.	

NA
6. Are there any other potential regulatory impacts the MRPBA should consider? If yes, please provide details.
NA
7. The draft Low value care statement (Attachment A) has been developed to provide additional guidance for medical radiation practitioners and connects with the requirements of the Code of Conduct and the sustainability principles published by Australian Commission on Safety and Quality in Healthcare (ACSQHC) a. Is there any content that needs to be changed, removed or added to the Low value care statement? b. Are there any potential negative or unintended affects that might arise?
NA
8. If updated <i>Professional capabilities for medical radiation practice</i> were to become effective from 1 January 2026 is this sufficient lead time for the profession, education providers and employers to adapt and implement the changes?
NA
9. Do you have any other feedback on the updated <i>Professional capabilities</i> ?
AIDH would welcome the opportunity to work further with the Board as it relates to the digital health capabilities of medical radiation practitioners.