

28 May 2025

Victorian Allied Health Professionals Association response to the MRPBA public consultation on “Updated Professional capabilities for medical radiation practitioners”

The Victorian Allied Health Professionals Association (**VAHPA**), also known as the Health Services Union Victoria No.3 Branch, is a specialist trade union which promotes and defends the industrial, professional, and democratic interests of a growing membership of over 6,000 Allied Health Professional (**AHP**) members working in almost all sectors of healthcare in Victoria – public and private hospitals, community health, disability, aged care, private allied health, and private radiology providers. VAHPA is the only trade union that represents Radiographers/Medical Imaging Technologists, Nuclear Medicine Technologists and Radiation Therapists (**Medical Radiation Practitioners**) in Victoria. VAHPA members play an integral role in ensuring the effective and professional running of the Victorian healthcare system, ensuring that patients are provided with safe and high-quality care.

VAHPA welcomes the opportunity to provide feedback on the draft of the proposed updated *Professional capabilities for medical radiation practice* (**Professional capabilities**) provided by the Medical Radiation Practice Board of Australia (**MRPBA**). The basis of the Professional capabilities is stated by the MRPBA as:

“The Professional capabilities identify the minimum knowledge, skills and professional attributes needed for safe and competent practice as a diagnostic radiographer, radiation therapist or nuclear medicine practitioner in Australia. They are used by the Board and the profession to assess and guide good safe practice. The Professional capabilities are also used by the Accreditation Committee and education providers who ensure that student learning outcomes and assessment tasks map to the threshold level of professional capability needed for both initial and continuing registration.”

VAHPA is not in a position to address the draft Professional capabilities as per the prescribed format of the consultation process as the proposed updated Professional capabilities are so fundamentally flawed, particularly in the area of clinical education, in their fundamental principles and the underpinning baseline capabilities expectations that it is impossible for VAHPA to address them in this way without legitimising them.

As noted above, clinical education is severely negatively affected by the draft Professional capabilities. In 2016 VAHPA reshaped the career structure for AHP employees in the Victorian public health sector, including for Medical Radiation Practitioners. The *Allied Health Professionals (Victorian Public Health Sector) Single Interest Enterprise Agreement 2016-2020 (the 2016 EA)* introduced 4 clearly identifiable career pathways for AHPs as they progress into more senior roles at Grade 3 and 4 - education, research, management and clinical. This structure allows AHPs, including Medical Radiation Practitioners, to specialise in education, research or management, while still maintaining a clinical role if preferred, and even allows them to work across 2 or more of these areas.

The draft MRPBA Professional capabilities framework has a focus on newly qualified Medical Radiation Practitioners having capabilities to teach, train, supervise and mentor. While VAHPA recognises the importance of these capabilities, it is unrealistic for new graduates or even recent graduate practitioners to have these capabilities.

Further work was done in the AHP classifications in the *Allied Health Professionals (Victorian Public Sector) (Single Interest Employers) Enterprise Agreement 2021-2026 (the 2021 EA)* that made it clear that Grade 1 AHPs (that is new and recent graduates), including Medical Radiation Practitioners, cannot teach, train, supervise or mentor students or other practitioners (see classification descriptor below). Grade 1 has been reduced to just 5 years, ensuring that new and recent graduates have time to consolidate and develop their skills, knowledge and experience before undertaking roles with these responsibilities. There is also now progression to Grade 2 immediately after completing 12 months at Grade 1 Year 5 (except in very limited circumstances where an employee is being performance managed or chooses not to progress to Grade 2), to ensure there is career progression for AHPs including Medical Radiation Practitioners.

The draft MRPBA Professional capabilities requires new and inexperienced Medical Radiation Practitioner graduates to teach, train and supervise the students who are immediately following them. This effectively traps the knowledge pool at the lowest end of the profession, making this pool shallower with each successive generation of new graduates, leading to a dangerous loss of expertise and knowledge.

Under the structure that VAHPA created, Clinical Educators are classified at Grade 3 or Grade 4, recognising and respecting the importance of these roles. The MRPBA Professional capabilities expects Grade 1s (new and recent graduates) to perform educational and supervisory roles. This completely undermines the work value of the higher grades and undervalues the important work of clinical educators.

The Victorian state government has recognised and supported this undertaking by concurrently funding new Clinical Educator positions with each of the last three enterprise agreement

outcomes (other than the short roll-over enterprise agreement). There were 11 full-time equivalent (**FTE**) positions established as part of the outcome in the *Victorian Public Health Sector (Health Professionals, Health and Allied Services, Managers and Administrative Officers) Multiple Enterprise Agreement 2011 – 2015*, 10 FTE as part of the outcome of the 2016 EA, and with the last enterprise agreement, the 2021 EA, the Victorian government created 100 new FTE Clinical Educator roles (20 Grade 4 and 80 Grade 3 positions). The Department of Health has also fostered a strong community of practice for these Clinical Educators who share their knowledge and expertise across the public health system. While these roles are open to all professions covered by the AHP enterprise agreements and are not exclusive to Medical Radiation Practitioners, Medical Radiations Practitioners have benefited greatly from the program.

The MRPBA highlights that the “guiding principles of the National Scheme” include:

- a) protection of the public;
- b) public confidence in the safety of services provided by registered health practitioners and students.

The changes proposed by the MRPBA in the Professional capabilities are also a public health and safety issue as they can negatively affect the safety and wellbeing of the Medical Radiation Practitioners and their ability to practice safely and effectively. VAHPA’s career framework is designed to protect Medical Radiation Practitioners in the workplace as they transition through the different phases of their career. This is particularly important in the early stages of a Medical Radiation Practitioner’s career when they need time to develop their skills, knowledge and experience without having responsibilities like training, teaching and supervision placed on them.

As such, VAHPA’s career framework ensures patient safety and quality of care through effective and efficient regulation of the practitioners’ career pathway, including ensuring that new and recent graduates are able to develop their skills, knowledge and experience in the clinical sphere (that is dealing with patients), before taking on additional responsibilities. The draft new Professionals capabilities, by undermining this career structure, seriously undermines public safety by placing greater responsibilities on new and recent graduates while they are still developing their skills, knowledge and experience.

Looking at the draft for the new Professional capabilities framework we see the unrealistic and problematic expectations for a new graduate Medical Radiation Practitioner occur at Domain 3, Capability 3 and Domain 4, Capability 3 g) and h) and Capability 4 a), d) and e):

Domain 3: Communicator and Collaborator

3. Effectively communicate and collaborate with assistants, students, and other supervised workers.	a. Use appropriate skills, training, strategies, and knowledge to effectively mentor, supervise and delegate tasks to assistants, students, and other supervised workers. b. Proactively recognise opportunities to educate assistants, students, and other supervised workers in the delivery of efficient, effective, and safe person-centred care. c. Deliver timely feedback (verbal and written) to assistants, students, supervised workers and relevant others, including education providers, on their performance. d. Engage with assistants, students, and other supervised workers to support their professional development, including engaging with self-directed learning and critical reflection. For students, this may include supporting their work readiness, in preparation for entering the workforce.
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Domain 4: Lifelong Learner

3. Peer learning and development	g. Deliver effective clinical teaching and assessment aligned to learning outcomes h. Provide effective feedback and critique to encourage reflection, learning and growth
4. Engage in peer development and mentorship.	a. Actively seek and engage in opportunities to mentor and support peer development d. Where relevant, participate in the teaching, learning and assessment of students, medical radiation practice assistants, and other supervised staff in the clinical setting. e. Where relevant, use appropriate development or mentoring strategies to support students, other medical radiation practitioners, medical radiation practice assistants, and other health practitioners in the clinical setting.

In direct contrast, this is the 2021EA classification descriptor for Grade 1 AHPs, including Medical Radiation Practitioners, is as follows:

“3. Grade 1 – General Definition

3.1 A Grade 1 Employee is an employee who:

- a) has a relevant qualification for their profession and/or meets the entry requirements described at Schedule 1 of this Appendix 4;*
- b) works on routine tasks within the scope of practice for their profession, consulting with a more experienced Employee when problems arise or when dealing with matters they are unfamiliar with; and*
- c) is able to work with students.*

3.2 This will generally be the entry level for new graduates.

3.3 A Grade 1 Employee cannot:

- a) supervise students;*
- b) Train students;*
- c) work shifts that would attract the night shift allowance; and/or*
- d) be on-call.”*

(The full career structure can be found in the attached copy of the 2021 EA.)

The VAHPA career structure for Medical Radiation Practitioners aligns with the well-established Dreyfus model of skills acquisition. The Dreyfus model is based on practitioners developing their career by progressively transitioning through these phases:

Novice > Advanced Beginner > Competent > Proficient > Expert.

The proposed new Professional capabilities creates an expectation that blends all of these progressive distinct phases of career development into one, at the threshold of a new graduate Medical Radiation Practitioner. This is unrealistic, dangerous, exploitative and not based on established principles of professional development.

Further, these changes could have a negative impact on the number of Medical Radiation Practitioners in the workforce, at a time where there is already a shortage, by:

1. placing too much responsibility on new and recent graduates early in their career, causing them to burn out and leave the profession; and
2. limiting the scope for career progression by reducing the ability of employees to progress to higher grades by performing clinical education work, causing experienced Medical Radiation Practitioners to leave their profession for other careers with great scope for career progression.

VAHPA has real concerns that these changes are being driven, at least in part, not by what is best for the public and for Medical Radiation Practitioners, but by those in managerial roles seeking to reduce costs by downgrading important clinical education work to employees at lower grades.

VAHPA urges the MRPBA to review and amend the planned Professional capabilities to avoid the consequences of empowering employers to potentially exploit new and recent graduates by inferring that they are suitably experienced to provide training and education to students or other junior Medical Radiation Practitioners. VAHPA has established a career pathway for Medical Radiation Practitioners that follows a safe and graduated advancement from student to novice practitioner to established practitioner to expert with specialisation. This career pathway benefits both the public and Medical Radiation Practitioners. We do not want to see these advances lost.

The industrial framework created by VAHPA ensures that only Medical Radiation Practitioners who have attained suitable skills, knowledge and experience can be required to educate, train and supervise. Unfortunately, not all Medical Radiation Practitioners across Australia have this in their enterprise agreement or award. This however is not an excuse to throw the baby out with the bathwater. VAHPA fears that the new Professional capabilities will be used by employers as a major barrier for these Medical Radiation Practitioners ever achieving a similar career pathway.



VAHPA remains open to further consultation with the MRPBA to help work towards appropriate Professional capabilities as opposed to those currently proposed which are completely inappropriate. Failing this, we implore the MRPBA to choose Option 1 and maintain the status quo.

Yours,

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Executive Officer (retired radiographer/sonographer)

Victorian Allied Health Professionals Association