

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
Contact information
Please include the contact person's name, position and email address
Kristie Matthews, Senior Lecturer, Monash University

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 These submissions will not be published on the website or elsewhere.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 <i>Professional capabilities</i> clear and reflective of autonomous and contemporary medical radiation practice? If no, please explain why.
Yes. However, the consistent use of the word 'patient' does not reflect contemporary approaches towards using 'consumer' as a preferable (to those with lived experience) alternative. I recognise the use of 'patient' may be necessary to align with national law, however would propose some kind of explanatory text in the introduction to acknowledge this choice may be of value
2. Is there any content that needs to be changed, removed or added in the updated <i>Professional capabilities</i> ? If yes, please provide details.
Suggestions: Domain 3, capability 3: This section is of essential, however enabling components are described 'top down', and the assistant/student are not recognised as part of the healthcare team in domain 3, capability 2 explanatory notes. I would suggest the explanatory notes acknowledge assistants/students as part of the health care team, particularly if we are intending students to be meeting all capabilities prior to graduation. Domain 6, capability 3c: 'navigate uncertainty with confidence' is really difficult to do for most individuals, let alone measure a capability against. I would propose something like 'engage with uncertainty'
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.
No
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.
No

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.
No
6. Are there any other potential regulatory impacts the MRPBA should consider? If yes, please provide details.
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?
I think the statement is a great addition
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?
It would be challenging from an education perspective to incorporate all changes in only 6 months
9. Do you have any other feedback on the updated <i>Professional capabilities</i> ?