

## Consultancy Specifications

### ***NCP Project on ‘Occupational Licensing’***

#### Background and Issues

Although the NCP review found (see Recommendation 12) that the “current systems of licensing and registration of operators, radiation equipment and radioactive substances are to be retained”, this section of the NCP review report (see Section 5 of the NCP Review Final Report) also made some observations and recommendations that require further review. These were discussed in the NCP review report under the following headings:

- National uniformity in licensing and registration requirements (this is covered under the project NCP-10)
- “Use vs. Responsibility”
- Nuclear medicine professionals and radiographers
- Dentists

#### *“Use vs. Responsibility”*

It was not entirely clear from some of the legislation under review if a licence for a company or individual to sell radioactive substances or radiation equipment would be sufficient to cover individual salespersons employed by the licensee or whether individual licences would be required for each salesperson. Another example of the ‘use v responsibility’ issue in the area of occupational licensing or registration is the question of whether the radiologist who authorises the x-ray examination or the radiographer who takes the X-ray is to be licensed or registered. The problem also arises in cases where a university department is located within a hospital. The question for the regulator is who is to be registered - the university, the department, the hospital or each individual user of radioactive substances or radiation equipment.

#### *Nuclear medicine professionals and radiographers*

The Australia and New Zealand Society of Nuclear Medicine (ANZSNM) Accreditation Board pointed out that some jurisdictions incorrectly treated a general qualification in medical imaging as sufficient for a person to undertake the duties of a Nuclear Medicine Technologist. The ANZSNM argued that legislation must recognise the differences in the medical imaging professions (Nuclear Medicine Technologist, Diagnostic Radiographer and Radiation Therapist) and the need for appropriate qualifications for each of these categories.

There are also disparities among jurisdictions in the way in which radiographers are currently licensed or registered (or not licensed or registered as the case may be). In some jurisdictions (Tasmania, Northern Territory and Victoria), radiographers are registered under other Acts that was not the subject of the NCP review. While there have been moves in WA to try to obtain registration requirements for radiographers, the NT is in the process of removing the requirement for radiographers to be registered.

The Review Team noted that the question of the licensing or registration of radiographers would be addressed by the jurisdictions as part of the development of the National Directory for Radiation Protection. The NCP Review Team did not make a specific recommendation in

this regard as it was advised that these issues have already been planned for action in the National Directory for Radiation Protection.

### *Dentists*

The Australian Dental Association (ADA) submitted to the NCP review that there is no need to licence dentists to perform dental radiography or require dentists to register their X-ray equipment. The ADA argued that routine exposure to dental radiography does not give rise to exposure levels of significant risk. On the question of registering dental X-ray equipment, it must be noted that information in some annual reports of the authorities showed that registrations of dental X-ray machines had been revoked in the past due to poor service and maintenance of the equipment.

One submission to the Draft Final Report pointed out that the deregulation of dental radiography equipment may mean that regular inspections could not take place, there would be no control over the siting of equipment and untested equipment could be imported into Australia without control over safety and quality. There would also be no control over the testing for the safe performance of the equipment and over ageing and outdated equipment that no longer meet safety standards.

The NCP review concluded that registration of dental X-ray machines must be retained to enable authorities to ensure that only equipment that meet safety standards are registered and these equipment are being properly serviced and maintained.

However, the issue of whether dentists required to be licensed was controversial. A proposal in the Draft Final Report of the NCP review that a review should be undertaken to assess if there is a case to remove the requirement for dentists to be licensed to operate dental X-ray equipment drew very strong objections for the following reasons:

- It would create inconsistencies when compared to requirements in some jurisdictions for dental therapists and dental nurses.
- Licensing is required as a gateway through which only those who demonstrate appropriate qualifications can gain entry.
- Dental radiography is a complex area and there are formal courses in dental X-ray techniques in some jurisdictions.
- A significant number of dental radiography examinations are carried out on children and adolescents and as such there is a need for control and monitoring.
- Repeated imaging of oral structures could potentially harm radiosensitive organs in nearby regions, such as the lens of eyes and thyroid glands.

The NCP review noted that not all jurisdictions license dentists to operate dental X-ray equipment and that this issue would require further consideration in the course of the preparation of the National Directory for Radiation Protection.

### Supported NCP Review Recommendations

Recommendation 13: “Jurisdictions are to review the need to license dentists as part of the development of the National Directory for Radiation Protection”.

**Planned outcome**

Efficient and effective occupational licensing systems that impose minimal compliance costs.

**Required outputs from consultant**

Review and recommend on the need to licence dentists to operate dental X-ray equipment.

Review and recommend on licence categories and occupational licensing/registration requirements in respect of the ‘use v responsibility’ issue and nuclear medicine technologists and radiographers, in particular, and all other radiation health and radiation protection occupational categories in general.

**Expected start and end dates of consultancy**

**Start date:** Date of execution of contract.

**End date:** To be proposed by tenderer.

**Selection Criteria**

- Extensive knowledge and experience in the area of radiation health and protection.
- Experience in the review of occupational licensing or registration requirements.
- Experience in the medical/dental area of occupational licensing or registration requirements.
- Ability to complete short-term public sector projects within tight deadlines.

**Closing date for expressions of interest:**

28 February 2003