



New Zealand
**Medical Radiation
Technologists Board**
Te Poari Ringa Hangarua Iraruke

CONSULTATION OUTCOMES

POLICY: NAMING OF PRACTITIONERS SUBJECT TO AN ORDER OR DIRECTION

IN NOVEMBER 2019 THE MEDICAL RADIATION TECHNOLOGISTS BOARD PUBLISHED A CONSULTATION DOCUMENT SEEKING FEEDBACK ON A POLICY FOR THE NAMING OF PRACTITIONERS WHO HAVE BEEN SUBJECT TO AN ORDER OR DIRECTION.

THIS REPORT SUMMARISES THE KEY THEMES OF THE CONSULTATION FEEDBACK AND THE BOARD'S RESPONSE

FEBRUARY 2020

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Introduction

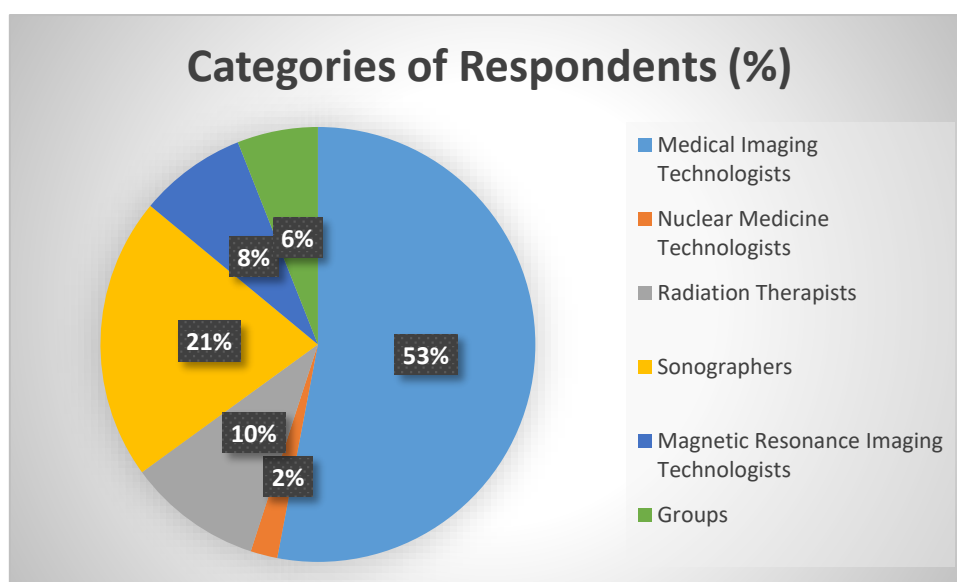
The Medical Radiation Technologists Board (the Board) extends its thanks and appreciation to the individuals and groups who provided feedback to a recent (November 2019) consultation on a policy for naming practitioners who have been subject to an order or direction. The policy has been set in accordance with the requirements of sections 157 and 157A to 157I of the Health Practitioners Competence Assurance Act 2003 (the Act).

Consultation Response Rate

The 3 submissions categorised as “groups” were received from the Office of the Privacy Commissioner, the Health and Disability Commissioner, and the Ministry of Health.

The 48 submissions received from members of the medical imaging and radiation therapy profession equated to 1.6% of the total number of practitioners who hold a current practising certificate which represents a relatively low response rate.

Category	Number of Respondents
Medical Imaging Technologists	27
Magnetic Resonance Imaging Technologists	4
Nuclear Medicine Technologists	1
Radiation Therapist	5
Sonographer	11
Group	3
TOTAL	51



Consultation Results

Questions	Response Options	MIT	MRIT	NM	RT	SON	GROUP	Total
Do you agree or disagree with the policy?	Agreed	25	3	1	4	9	3	45
	Disagreed	2	1	-	1	2	-	6
Is there anything stated in the policy that requires further clarification?	Yes	2	1	-	1	5	3	12
	No	25	3	1	4	6	-	39

Consultation Feedback: Key Themes

Consultation respondents were asked to provide their feedback via an online questionnaire in response to two questions. The following table summarises key themes from respondents' answers to those questions.

Question	Respondent Themes
1. Do you agree or disagree with the policy?	<ul style="list-style-type: none">- The policy supports transparency and will allow for improved patient trust in respect of the way investigations are undertaken- Need to be seen to be transparent and mindful of practitioners' role in protecting the public- Raises practitioner's awareness of the personal and professional behaviours expected of them- Flow charts show the rigorous process that will be followed which gives (me) confidence- One respondent expressed a concern that the policy was punitive and breaches an individual practitioner's right to privacy
2. Is there anything stated in the policy that requires further clarification?	<ul style="list-style-type: none">- Make it clearer the policy applies to not only practitioners who are practising currently but also who remain on the register and have practised in the past- Format could be changed so there is explicit reference to each of the clauses under section 157B of the Act which articulates what a naming policy must set out- Some practitioners expressed concern about the use of social media to publish a naming notice

Board Deliberation and Decision

The Board noted that while over 75% of respondents did not identify any improvements in respect of the clarity of the policy document, other respondents did make a number of recommendations as to how clarity could be improved.

The Board noted the concern of one respondent who perceived the policy as being punitive and a breach of an individual's right to privacy. It is important to understand that a fundamental purpose of the policy is to enhance the quality and safety of health care. The policy aims to enhance public confidence in the medical imaging and radiation therapy profession and provides transparency about the processes the Board will use in respect of their decision-making processes. The Board is confident the naming policy for medical imaging and radiation therapy practitioners has sufficient and appropriate references as to how the decision making process will take cognisance of weighing the privacy interests of practitioners against the public interest.

The Board's final edition of the policy on *Naming of Practitioners Subject to an Order or Direction* includes a number of formatting changes with the policy being structured around each of the factors listed in the provision under section 157B (3) of the Act in terms of what a naming policy must set out.