Summary of Underpinning Analysis: Scopes of Practice and Prescribed Qualifications for Te Poari Ringa Hangarau Iraruke | the Medical Radiation Technologists Board 2026

Agency responsible	Te Poari Ringa Hangarau Iraruke | The Medical Radiation Technologists Board
Portfolio	Minister of Health
Date finalised	19 November 2026
Identification Number	N/A

Good law-making: 9(i)

The importance of consulting, to the extent that is reasonably practicable, the persons or representatives of the persons that the responsible agency considers will be directly and materially affected by the legislation.	
Inconsistency identified?	NO
Summary of agency analysis	

The draft scopes of practice and prescribed qualifications were consulted on with the profession, stakeholders and the public between November 2025 and January 2026. The consultation was publicly available from the Board's website, as well as direct notification to practitioners and stakeholders. The Board is satisfied that it made all reasonable efforts to make people aware of the consultation and had an opportunity to provide feedback on the consultation.

The Board received feedback from a broad range of stakeholders and carefully considered all the feedback received. Structured analysis of the feedback was undertaken to ensure that all aspects of the feedback were considered by the Board when making decisions. The Board made several modifications to the draft scopes and prescribed qualifications as a result of the feedback received.

Good law-making: 9(j)

The importance of carefully evaluating—

- the issue concerned; and
- the effectiveness of any relevant existing legislation and common law; and
- whether the public interest requires that the issue be addressed; and
- any options (including non-legislative options) that are reasonably available for addressing the issue; and
- who is likely to benefit, and who is likely to suffer a detriment, from the legislation

Inconsistency identified?	NO

Summary of agency analysis

In developing the proposal for consultation, the Board undertook a process which included identification of the issues to be addressed, research about the issues and how they may be managed, identification and analysis of options for consideration, advice from a group of subject matter experts, and development of a preferred option for consultation. The effect of retention of the status quo was also considered.

The Board considered how the changes would support and enhance the ability of medical imaging and radiation therapy practitioners to deliver safe and effective services to the public of Aotearoa New Zealand, as well as considering the effect of changes on individual practitioners, students, employers and other health practitioners.

Good law-making: 9(k)

The importance of the responsible agency identifying and developing effective arrangements for implementing the legislation

Inconsistency identified?	NO

Summary of agency analysis

The Board has considered the operational changes required to give effect to the scope of practice and prescribed qualifications for registration. The Board has developed an implementation plan which includes general communication; targeted communication with those specifically affected; policy and procedure updates; updates to website content; and internal system updates.

The plan has also considered feedback received during the consultation to ensure areas of concern identified are addressed, in so much as they lie within the Board's control.

Good law-making: 9(l)

Legislation should be expected to produce benefits that exceed the costs of the legislation to the public or persons

Inconsistency identified?	NO

Summary of agency analysis

The expected benefits of the changes outweigh the associated costs. Under the Health Practitioners Competence Assurance Act 2003 (the Act), the Board must define scopes of practice and prescribe qualifications for registration. It must also regularly review these scopes and qualifications to ensure they remain fit for purpose and give effect to the Board's mandate to protect the health and safety of the public by ensuring that medical imaging and radiation therapy practitioners are fit, qualified, and competent to practice.

The reviewed scope supports the effective delivery of safe medical imaging and radiation therapy services and provides mechanisms to allow for practitioners to respond to service needs. The prescribed qualification descriptions have been aligned in language and options to consider other qualifications that meet the required standard that has been developed.

Good law-making: 9(m)

Legislation should be the most effective, efficient, and proportionate response to the issue concerned that is available	
Inconsistency identified?	NO
Summary of agency analysis	

The scope of practice definition and prescribed qualifications are the most effective, efficient and proportionate response to the issues identified by the Board. The scope and qualifications give effect to the Board's mandate of protecting the health and safety of the public while allowing flexibility to support evolving service needs and technology.

Rule of Law: 9(a)(i)

The law should be clear and accessible	
Inconsistency identified?	NO
Summary of agency analysis	

The scopes of practice and prescribed qualifications have been drafted to be clear and accessible. Areas of alignment have been identified and combined, and consistent language used throughout the notice. Pathways for registration have also been aligned for consistency and clarity about the requirements.

The Board website provides further information about the scope of practice and prescribed qualifications to ensure that practitioners, stakeholders and the public have appropriate information to understand how the notice applies to their particular situation.

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Rule of Law: 9(a)(ii)

The law should not adversely affect rights and liberties, or impose obligations, retrospectively	
Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Rule of Law: 9(a)(iii)

Every person is equal before the law	
Inconsistency identified?	NO
Summary of agency analysis	

The scope of practice notice applies to all practitioners who are working in medical imaging and radiation technology in Aotearoa New Zealand and describes the contents of the profession of Medical Radiation Technology as required in section 11 of the Act.

The prescribed qualifications describe the different pathways for registration available to applicants. The pathways reflect the level of assurance that the Board possesses about applicants in each pathway and aligns to the Board's mandate to ensure all practitioners on the register meet the requirements for registration as described in section 15 and 16 of the Act.

Rule of Law: 9(a)(iv)

There should be an independent impartial judiciary	
Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Rule of Law: 9(a)(v)

Issues of legal right and liability should be resolved by the application of law, rather than the exercise of administrative discretion	
Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Liberties: 9(b)

Legislation should not unduly diminish a person's liberty, personal security, freedom of choice or action, or rights to own, use, and dispose of property, except as is necessary to provide for, or protect, any such liberty, freedom, or right of another person

Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Taking of property: 9(c)

Legislation should not take or severely impair, or authorise the taking or severe impairment of, property without the consent of the owner unless—

- there is a good justification for the taking or severe impairment; and
- fair compensation for the taking or severe impairment is provided to the owner; and
- the compensation is provided, to the extent practicable, by or on behalf of the persons who obtain the benefit of the taking or severe impairment

Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Taxes, fees and levies: 9(d)

The importance of maintaining consistency with section 22(a) of the Constitution Act 1996 (Parliamentary control of taxation)

Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Taxes, fees and levies: 9(e)

Legislation should impose, or authorise the imposition of, a fee for goods or services only if the amount of the fee bears a proper relation to the cost of providing the good or service to which it relates

Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Taxes, fees and levies: 9(f)

Legislation should impose, or authorise the imposition of, a levy to fund an objective or a function only if the amount of the levy is reasonable in relation to both—

- the benefits that the class of payers is likely to derive, or the risks attributable to the class, in connection with the objective or function; and
- the costs of efficiently achieving the objective or providing the function

Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

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Role of courts: 9(g)

Legislation should preserve the courts' constitutional role of ascertaining the meaning of legislation	
Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Role of courts: 9(h)

Legislation should make rights and liberties, or obligations, dependent on administrative power only if the power is sufficiently defined and subject to appropriate review	
Inconsistency identified?	NOT APPLICABLE
Summary of agency analysis	

Additional information

Relevant publicly available inquiry, review, or evaluation reports

Consultation documents relating to the development of the scope of practice and prescribed qualifications are available from the Board's website.
Consultations | Medical Radiation Technologists Board

Relevant international treaties, standards and obligations

The scope of practice and prescribed qualifications are consistent with the requirements of the Trans-Tasman Mutual Recognition Act.

Departures from the Legislation Guidelines

NIL

Other unusual provisions or features

NIL