



Australian  
Nursing &  
Midwifery  
Federation

# Sonographer Regulation Working Group Consultation – Ministerial Health Council submission to include sonographers in the National Regulation and Accreditation Scheme

30 November 2020

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## Introduction

The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 295,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

The ANMF welcomes the opportunity to provide a response to *the draft Ministerial Health Council submission to include the sonographer profession in the National Registration and Accreditation Scheme under the Medical Radiation Practice Board of Australia* and wish to support sonographers in their application for regulation under the National Registration and Accreditation Scheme (NRAS).



## Consultation template

### Your details

Please provide your details in the following table

|                      |   |
|----------------------|---|
| <b>Name:</b>         | Annie Butler                                |
| <b>Title:</b>        | Federal Secretary                           |
| <b>Organisation:</b> | Australian Nursing and Midwifery Federation |

#### 1. Are the responses to the six criterion adequate and clear? If no, how could the criterion response(s) be improved?

The six criterion have been thoroughly addressed in *the Protecting the Public and Preventing Harm by Completing the Regulation of Medical Imaging Professions submission*. The potential risk to the public posed by sonographers has been clearly identified and explained.

The consultation paper identifies that *'Sonography is a well-defined profession with sonographer the occupational title that describes the professionals providing comprehensive medical ultrasound examination regardless of the specified scopes of practice'*.<sup>1</sup>

Further *'a sonographer is a highly skilled medical imaging allied health professional who operates an ultrasound machine to perform the majority of diagnostic medical ultrasound services, which are often the first diagnostic imaging service accessed by patients'*.<sup>2</sup>

The ANMF notes that:

- the request for sonographers to be regulated under the NRAS is to be regulated by the Medical Radiation Practice Board of Australia where 24.5%<sup>3</sup> of sonographers are already regulated;
- there are 6,654 medical sonographers as of October 2020<sup>4</sup>;
- sonographers are the only medical imaging profession not regulated in Australia<sup>5</sup>;

<sup>1</sup> draft Ministerial Health Council submission to include the sonographer profession in the National Registration and Accreditation Scheme, p-28

<sup>2</sup> Ibid, p-6

<sup>3</sup> Ibid, p-9

<sup>4</sup> Ibid, p-21

<sup>5</sup> Ibid, p-34



- the current *National Code of Conduct for Health Care Workers* is not meeting the regulation needs of sonography; and
- *'regulation of the sonographer profession would not limit or regulate those who can and can't perform ultrasound scans'*.<sup>6</sup> The proposed regulation is instead focused on ensuring national registration, accreditation and a notifications process for sonographers currently regulated under NRAS.

It is the view of the ANMF that our sonographer colleagues have clearly established the need to be regulated under the NRAS and thereby seek regulation to effectively protect the public. The ANMF supports sonographers in their request.

The ANMF does however identify, there are a number of nurses and midwives who currently perform ultrasounds within their scope of practice. Some are performing comprehensive medical ultrasounds and others point of care ultrasounds to enhance and extend their clinical examination of persons in their care, as defined in the consultation document.

It is important to note that as registered health practitioners, nurses and midwives are already regulated and therefore required to meet mandatory national registration standards and standards for practice to maintain their registration. This includes undertaking the required education for safe and competent practice to enable them to effectively add procedural care, such as ultrasounds, to their scope of practice. The ANMF would not support any further regulatory burden being applied for these nurses and midwives.

## **2. Does the Submission adequately link public health/patient safety with the inclusion of sonographers in the NRAS? Why or why not?**

The submission provides a comprehensive and articulate link between the role of sonographers and the need for these professionals to be included in the NRAS to ensure public safety.

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<sup>6</sup> *ibid*, p-28



The scope of a sonographer in the submission is clearly identified as well as the potential detrimental risk to public safety if an error occurred. The risk that requires mitigation through regulation for sonographer's in relation to performance and conduct is extensively outlined.

**3. Does the Submission clearly state how regulation under NRAS addresses the public risk posed by the activities of the sonographer? Why or why not?**

As outlined in the previous question, the ANMF notes that the submission does identify how regulation under NRAS would mitigate public risk posed by the activities of a sonographer. The executive summary for criterion 2 in the submission, along with criteria 2.1to2.4, and 6.1, clearly describe the potential for public harm. This is also well supported in the appendices. Appendix one describes the physical and emotional harms of self-reported instances of sonographer failure, and convincingly demonstrates how regulation under NRAS will reduce these harms. This is reinforced by the high profile examples (both local and international) outlined in appendix two.

Sections B and C of appendix 4 also demonstrate the advantages to the public of having a single, streamlined complaints process to a body that has the capacity to take action in the event of professional misconduct.

**4. Are there any statements in the Submission that you disagree with?**

As identified earlier the ANMF supports the sonographers in their request to be regulated under NRAS and also supports the statements made in the submission which outline that the proposed regulation would not regulate who can and can't perform ultrasound scans.

The ANMF reinforces that if this request for sonographer regulation under NRAS was successful, we would not support any further regulatory burden for nurses and midwives who are currently performing ultrasounds as part of their already regulated scope of practice.



#### **5. Any other feedback on the Submission**

The ANMF does not have any other feedback to provide at this stage.

#### **Conclusion**

The ANMF thanks the Sonographer Regulation Working Group for the invitation to provide feedback to this submission. The application is comprehensive, and builds a strong, persuasive argument for sonographers to join the National Regulation and Accreditation Scheme. We wish sonographers success with their application.