

## Preview survey questions on the draft National Strategy for Radiation Safety

### Introduction

1 What is your name?

Name: Mark Hutton

2 What is your email address?

Email: president@ada.org.au

3 What is the name of your organisation?

Organisation: Australian Dental Association (ADA)

4 Are you providing feedback on behalf of your organisation?

Yes/No

5 What is your industry?

Options are provided in the dropdown list: Health and Medical

Other: Provide your answer in the text box:

### The draft National Strategy

6 Is your industry adequately catered for by the objectives of the National Strategy for Radiation Safety?

Yes/No/I don't know (Partly agree)

In principle support – Yes. The national strategy includes 5 key objectives that are all relevant to radiation safety and management in the dental practice, except for large-scale incident management. The most relevant objectives to the dental profession are **uniformity** (developing and implementing a national approach to risk identification, assessment, and management and competency framework for those who use radiation within dental practices); and **science-driven policy** to implement an evidence-informed approach to review and development of codes and standards.

7 Are the suggested objectives the right ones to include in the Strategy? Are there alternate or additional objectives that should be included to ensure Australian governments are able to deliver a regulatory system that continues to protect people and the environment from the harmful effects of radiation?

Provide your answer in the text box:

The draft national strategy for radiation safety, as is currently written, focuses on the effective management of radiation incidents in case of large-scale emergencies. It does not reflect on the framework for planned exposure situations and existing exposure situations. These should be addressed in the national strategy and implementation plan.

Implementation of the national radiation strategy could impose a great impost on already heavily compliant industries such as dentistry unless efficiencies are realized between national and state jurisdictions to prevent unnecessary business impacts.

8 Are there additional objectives that would maximise the benefits to be gained from the safe and justified use of radiation?

Provide your answer in the text box:

Develop a framework for the effective management of planned exposure situations and existing exposure situations.

Provide education and training to increase the competency of operators/ users of radiation sources.

9 Do you agree with the guiding principles of the National Strategy?

Yes/No

Yes. They provide a framework for quality and safety and a basis for jurisdictional uniformity.

10 Are there additional guiding principles you think need to be included?

Provide your answer in the text box:

While ADA supports the current guiding principles, there are additional guiding principles that should be included in the national strategy. These include

- Clear division of responsibilities for radiation risk management
- Provide users with adequate information and training
- Optimization of protection.

11 What do you think are the major risks and challenges facing governments, regulators, and users of radiation? Are these adequately reflected in the National Strategy?

Provide your answer in the text box:

The greatest challenge for governments, regulators, and users is communication and messaging around compliance. Many dental practitioners want to do the right thing, but often exactly what they need to do to meet their obligations is not clear. A recent example in Victoria is that all holders of radiation management licenses were sent a generic email reminding them of their obligations for routine testing of radiation equipment. Many dental practices were not sure if they were included and queried the testing of equipment.

The other challenge faced by the Australian health care system is the fragmentation of healthcare especially for people with chronic illnesses. Increased fragmentation contributes to the separation of patient records despite a national push towards the My Health Record (My HR) system. Without equal access for primary care practitioners other than general medical practitioners, such as dentists whose practice management systems sit outside the MyHR system, continued fragmentation will continue to occur.

The difficulty of interoperability and information exchange between several providers may lead to a potential repeat of radiological procedures by different providers and thus increased exposure, increased cost, and inconvenience to patients. Medical records easily available to providers with the findings of previous investigations will reduce the number of unnecessary procedures and exposure.

### Implementation Plan

12 Are there any additional actions that should be included in the Implementation Plan to reduce inconsistencies or unnecessary red tape, without compromising safety?

Provide your answer in the text box:

While the ADA agrees with the proposed strategic actions, there are additional actions that should be included in the Implementation Plan to reduce inconsistencies or unnecessary red tape, without compromising safety. These are

- Risk communication should be included in the implementation plan. The World Health Organization Global Initiative on radiation safety in healthcare settings adopted a strategic approach in managing radiation risks by implementing a continuous process of risk identification, risk assessment, risk management, and risk communication. Risk communication is crucial for providing patients, family members, and the public with the necessary information risks of radiation. Risk communication also involves creating awareness of radiation risks and their safe use in healthcare settings, promoting stakeholder engagement.
- Communication strategy should be included in the implementation to reduce inconsistencies or unnecessary red tape, without compromising safety.
- While the implementation plan focuses on the development of a national competency framework for those who use radiation within radiation practices, it should include education and training programs that are necessary for the users to increase their competencies. On-job training, mentoring, and continuing education should be provided for users to increase their competencies and be included in the implementation plan.

13 What additional actions could be included in the Implementation Plan to harmonise the effective management of significant radiation incidents?

Provide your answer in the text box:

Emergency preparedness and response require a coordinated approach with a clear division of roles and responsibilities. Although this is mentioned in the strategy paper, a clear division of roles and responsibilities should be considered as one of the strategic actions.

Education and necessary training to increase the competencies of a wider range of professionals and practitioners involved in effective radiation incident management to ensure an effective emergency response.

National strategy translated into a locally defined incident management protocol. For example, whom to contact on a State or local basis. Specific numbers and information for assistance.

14 Are there any additional actions in the Implementation Plan that would support the development of radiation safety codes and standards?

Provide your answer in the text box:

Risk communication is very crucial to provide the necessary information and create awareness among different stakeholders and the public. The World Health Organization (WHO) adopted a continuous process of risk identification, risk assessment, risk management, and risk communication.

Collaboration within jurisdictions and stakeholder engagement for the development of codes and standards within industries, e.g., Dental.

15 What additional actions in the Implementation Plan could be included in the National Strategy to future proof the radiation safety regulatory framework?

Provide your answer in the text box:

Develop a National Commission for radiation safety, empowered with developing and administering regulatory framework for radiation in Australia.

16 Are there any additional actions in the Implementation Plan to improve the life-cycle management of radioactive materials?

Provide your answer in the text box:

Provide adequate information and training for the individuals who are involved in the safe and secure management of end-of-life or disused radioactive sources. Improper management and disposal of radioactive sources result in more detrimental effects both to the humanity and environment.

#### Additional Comments or Suggestions

17 Do you have any additional comments or suggestions about the National Strategy or Implementation Plan?

Provide your answer in the text box:

There are certain groups of people who are more vulnerable to radiation than other groups. Children are more sensitive to radiation than adults and require greater protection. Prevention of unnecessary radiation exposure is therefore crucial in paediatric patients by justifying procedures and optimizing doses. Children, young adults, and pregnant women should be particularly considered when developing policies to improve radiation safety in healthcare settings. These groups should be given a special focus on the national strategy and implementation plan.

According to the radiation guidelines Victoria 2021, in Victoria, the dental sector takes up the maximum management licenses comprising about 53% followed by industrial (20%), veterinary (15%), medical (9%), and chiropractor (3%). Licenses for use in the medical and dental sectors are the same. Despite the same number of licenses with the medical sector, oral health (dentistry) is not given special attention in the national strategy and implementation plan.

18 Is there any additional information or document that you would like to provide?

Upload additional information here:

N/A