

25 May 2018

Australian Radiation Protection and Nuclear Safety Agency  
619 Lower Plenty Road  
Yallambie, Vic 3085

[Submitted via web portal]

Dear Sir/Madam,

**Re: Code for radiation protection in medical exposure**

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide comment and feedback on the *Code for radiation protection in medical exposure*.

The RACGP agrees with the premise that sufficient clinical details on request forms are vital in order to justify exposing a patient to radiation. A request form that fails to include the indication for the procedure and request for imaging should be considered inappropriate. Over-diagnosis and inappropriate radiation exposure are significant concerns to the RACGP, and it is hoped that this requirement will help to reduce unnecessary imaging requests.

From a general practitioner (GP) perspective, if the particular requested test is considered inappropriate by the radiological medical practitioner or a better or safer test is available, the suggested alternative test must be discussed and agreed with the referring medical practitioner before the test is undertaken. This should be in writing and if initially communicated via telephone, documented after the fact in writing. The requesting process could be simplified and enhanced with the use of secure messaging allowing asynchronous communication that can also be documented in the patient's clinical record.

In general, the rules around who can request X-rays and scans need to be examined and tightened. Only appropriate referrers with suitable skills and knowledge should be permitted to make the imaging requests. As an example, chiropractors can currently order whole spine x-rays without providing evidence of improved patient health.

We look forward to hearing about the progress and outcomes of this consultation

Yours sincerely



Dr Charlotte Hesse  
Vice President