

The Source

News from the Department of Health
Radiation Team
February 2021, Edition 3

Welcome to the third edition of The Source, a newsletter from the Radiation Team of the Department of Health. All workplaces have been affected in some way by Australia's response to the coronavirus (COVID-19) so we have included links to information that may be of use to you or your organisation.

There are also updates on other matters that may relate to your radiation practice.

Neil Wain

Team Leader, Radiation

Machinery of Government change

On 30 November 2020, the Premier announced a major Machinery of Government (MoG) change that would result in the Department of Health and Human Services becoming two departments.

From 1 February 2021, the Department of Health and Human Services became two departments, the Department of Health (DH) and the Department of Families Fairness and Housing (DFFH).

The Radiation Team will form a part of the Department of Health.

Contact details

Our current email addresses will remain the same for some time. Any emails you receive from the radiation team may still have the 'dhhs' domain for a little longer but will eventually migrate across to the new 'health' domain. Emails you send to the 'dhhs' domain will continue to be received until we advise you that the changes to the email addresses have been made.

How does this affect existing licences?

Over the next few weeks, we will make the applicable changes to ensure that all new licences are issued in the name of the 'Department of Health'. Note that licences already issued in the name of the 'Department of Health and Human Services' will not be impacted by the change in the department's name.

Impacts of coronavirus COVID-19

The coronavirus COVID-19 pandemic resulted in some impacts on the delivery of the radiation safety regulatory program because of the need to deploy staff to assist with the response to the pandemic. The pandemic also triggered an increase in licensing applications, particularly from recently retired medical radiation practitioners seeking to become licensed to assist with the potential need for surge staff in hospitals.

The latest information on coronavirus COVID-19 is available at <https://www.dhhs.vic.gov.au/coronavirus>.

For those of you who use twitter for information, you may wish to follow our Chief Health Officer, Adj Clin Prof Brett Sutton on Twitter @VictorianCHO

We acknowledge the stress that this crisis is causing to the Australian community. In particular, we would like to acknowledge the efforts of health professionals working in our hospitals.

We have received some questions about how the department will view situations where a mandatory action cannot be completed because of the impacts of coronavirus COVID-19. We suggest that, if you feel that you or your organisation might become non-compliant due, at least in part, to coronavirus COVID-19, you email us as early as possible so we can work with you to find a solution.

New licensing system is live!

Many of you will be aware that we have implemented our new licensing system starting with use licences, approved testers, and approved assessors. At the time of writing, close to 12,000 use licence holders have registered on the system.

The new system allows registered users to apply for a licence, to apply to renew a licence, or to apply to vary an existing licence. Users can also download a copy of their licence and make changes to their contact details at any time.

The email address that we have recorded for you is a key part of the initial registration process on the system. Please note that this email address needs to be unique to one person and not a shared account.

If you hold a current use licence and you have registered with the email address that we have recorded on our register, then you will see your licence. Sometimes this matching process can take up to 15 minutes. Do not worry if your licence is not there immediately. If you cannot see your licence after 15 minutes, then please contact us by email listing your name, your licence number, and your preferred email address. The major reason for not seeing your licence is that the email that has been used to register is different to the one we have recorded. Do not apply for another licence as this application will result in you paying an unnecessary and non-refundable application fee of \$66.60.

We have ceased posting all correspondence. Our communications will now only be sent to you via email.

If you have not yet registered on the portal and you did not receive this newsletter by direct email, it probably means that we do not have your preferred email address. If this is the case, please email us using your preferred email address, quoting your full name and current licence number to confirm your identity. We will notify you after we have made the change to your licence.

Early on we did experience several technical issues, particularly with some email systems blocking the emails sent by the licensing system and some compatibility issues with different web browsers. We apologise for any inconvenience that this may have caused but we have now implemented several fixes. These fixes mean that most of the problems have disappeared for most users. However, as with all new information systems there may still be problems for some users. If you experience any problems, please send us an email describing what happened. Sometimes, emailing us a screenshot of the problem you are experiencing can help us understand the issue. Similarly, if you need assistance to register for the first time, please email us at radiation.safety@health.vic.gov.au.

The portal is located at <https://licensing.dhhs.vic.gov.au>

More information about the system is available at:

<https://www2.health.vic.gov.au/public-health/radiation/licensing/licensing-portal>

How do I renew my use licence, tester's approval, or assessor's approval?

You must first register on the new portal system using the email address you provided to the department, as described above. When you have registered on the portal, our system will notify you by email 60 days before your licence expires. The email will invite you to renew your licence. The system will allow you to choose your licence period and whether you want to pay by credit card or BPay.

Your application to renew your licence is then sent to the department. You will be advised by email when your application has been decided. If your licence renewal application has been approved, then you can download a copy of your licence. Our public register is updated to reflect your new licence expiry date.

We strongly recommend putting a reminder in your calendar a month or so before your expiry date just in case there is a problem with the email reaching you. It is important to note that individuals are responsible for making sure they have a current licence.

Please note that Section 51 of the Radiation Act 2005 means that if you apply to renew your licence before the expiry date, your licence will remain valid until the department renews the licence or refuses to renew the authority.

Can I still renew my licence if it has expired?

Yes, if you apply within 60 days of the expiry date. After that time, the licence de-activates and you will need to re-apply for a licence. Please note that if you do not apply to renew your licence before it expires, you are not permitted to use radiation sources until it has been renewed by the department.

Does the department issue tax invoices?

No. These fees are exempt of GST under Division 81 of the Goods & Services Act 1999.

Do we issue receipts for payments?

We have recently received approval to issue receipts for payments. If you require a receipt for payment, please email radiation.safety@health.vic.gov.au to request the receipt. The next major software update to the licensing portal system will allow receipts for payments to be generated by the user.

Current use licence application processing times

It is currently taking approximately two weeks for applications to be decided. We expect that time to reduce over time as we make further improvements to the new system.

When will the portal be available for management licences?

We are aiming to implement the system for management licences during the first half of 2021. Any person who is authorised to act on behalf of a management licence holder will also need to register on the portal.

Check out our public register of use licences

Did you know we publish a limited public register of use licence holders?

This register means anyone can check whether a person is licensed.

Management licence holders are reminded that they should also use the register to check that their staff and contractors have the appropriate licences. The status of the licence is shown on the register including whether it has expired and is therefore no longer valid.

The location for the register has changed and is now located at <https://licensing.dhhs.vic.gov.au/public/use-licence>

Please note that we do withhold the details of a small number of use licence holders who are authorised to use high consequence radioactive material.

Mutual recognition

One of the major changes implemented with the roll out of our new licensing system is the administration of the mutual recognition system for use licences. This system only applies to people who hold a radiation user/operator licence in another Australian state or territory or in New Zealand. If they are eligible, then they can work in Victoria and use radiation sources whilst the application is being assessed if the scope of that use is consistent with the interstate or New Zealand licence.

To be eligible to use this system, a person who holds a current radiation user/operator licence in another Australian state or territory or in New Zealand must apply using the portal. They will be asked to attach a very specific type of statutory declaration which must be downloaded from our website at <https://www2.health.vic.gov.au/public-health/radiation/licensing/use-licences-employees/mutual-recognition-use-licence>. They will also be asked to attach a copy of the current radiation user/operator licence that they are relying on for mutual recognition purposes.

Please note that there is a requirement to hold a radiation user/operator licence in another Australian state or territory or in New Zealand for the mutual recognition system to apply. For example, holding registration with AHPRA or with an interstate or New Zealand Veterinary Practitioner's registration board without holding a radiation user/operator licence does not allow the mutual recognition system to apply.

We recommend that you contact us if you have questions about this system before lodging an application.

There is currently a National Cabinet initiative being discussed which is expected to result in significant improvements to this system. For more details see <https://pmc.gov.au/domestic-policy/deregulation-taskforce/occupational-mobility>

New Code for Radiation Protection in Medical Exposure

A new Medical Code has been published by the Australian Radiation Protection and Nuclear Safety Agency. Upon endorsement by the Australian Health Ministers, all states and territories will be required to implement the Code. In Victoria, the code will be implemented through a variation to the relevant management licences and use licences.

There is also a national project to develop clear and nationally agreed expectations as to what compliance with the new Code looks like. These compliance expectations will also be published when endorsed.

We will provide more information when these documents have been endorsed and before we vary the relevant licences. At this stage we expect that the new Code will be implemented during 2021.

The Code may be downloaded at:

<https://www.arpansa.gov.au/regulation-and-licensing/regulatory-publications/radiation-protection-series/codes-and-standards/rpsc-5>

ARPANSA releases updated Australian diagnostic reference levels for adult CT

A recent article in the Journal of Medical Radiation Sciences described the development of updated DRLs for adult CT in Australia by ARPANSA.

The existing six procedure categories were revised and refined. Updated Australian national diagnostic reference levels for adult CT were recommended and endorsed for eight procedure categories: head (52 mGy/880 mGycm), cervical spine (23 mGy/470 mGycm), soft-tissue neck (17 mGy/450 mGycm), chest (10 mGy/390 mGycm), abdomen–pelvis (13 mGy/600 mGycm), kidney–ureter–bladder (13 mGy/600 mGycm), chest–abdomen–pelvis (11 mGy/940 mGycm) and lumbar spine (26 mGy/670 mGycm).

The updated national DRLs are between 12 and 26% lower than the previous DRLs for dose-length product and between 13 and 63% lower for volume computed tomography dose index. The revised national DRLs are lower, better reflecting current practice among imaging facilities in Australia and are similar to those in other developed countries.

We recommend the adoption of these revised DRLs as part of a national process for continued optimisation of adult CT population dose.

Review of justification for mandatory phasing out of CR Mammography units

The department is reviewing whether to introduce a mandatory requirement to phase out CR (computed radiography) mammography units. This review is being undertaken because of studies that report significantly lower breast cancer detection rates and higher radiation doses associated with CR mammography units when compared with digital radiography (DR) units. In its Position Paper “RECOMMENDATIONS FOR A DIGITAL MAMMOGRAPHY QUALITY ASSURANCE PROGRAM V4.0”, the Australasian College of Physical Scientists and Engineers in Medicine (ACPSEM) also recommends that “only DR technology should be approved for future purchases of equipment for screening mammography in Australia and New Zealand and existing CR systems should be progressively replaced.”

In Victoria, approximately 15% of mammography units utilise CR technology.

We expect to write to all relevant licence holders and other stakeholders in 2021 seeking feedback regarding the department’s preferred position.

Activities of the Secretary under the Radiation Act 2005

The 2019-2020 annual report is available on the department’s website and includes a detailed breakdown of the department’s activities over that year. The report also includes a list of the 183 radiation incidents reported to the department, 179 of which were in the medical sector. They occur, for example, when: medical imaging staff do not correctly follow their institution’s patient and procedure identification protocols; a patient who undergoes a medical imaging procedure is subsequently found to have been pregnant; an interventional fluoroscopic procedure involves a high skin entrance dose, and; a radiopharmaceutical is extravasated or spilled.

The number of reported medical incidents in 2019-2020 was about 18 per cent lower than the previous year. The reduction of incidents may be linked to lower health service use during the pandemic. The 2019- 2020 annual report is available at:

<https://www2.health.vic.gov.au/public-health/radiation/radiation-regulatory-framework/radiation-laws/annual-report>

The Australian Radiation Incident Register (ARIR), maintained by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), is Australia's national database of radiation incidents and events. Annual summary reports of the ARIR are published by ARPANSA and are available at:

<https://www.arpansa.gov.au/regulation-and-licensing/safety-security-transport/australian-radiation-incidents-register/annual-summary-reports>

NSW Court fines company \$132,000 for radiation security and safety breaches

In December 2019, the NSW Land and Environment Court fined Gammasonics Institute for Medical Research Pty Ltd a total of \$132,000 for radiation offences relating to the transport and storage of a high consequence radioactive device in Sydney, following a successful prosecution by the NSW Environment Protection Authority (EPA). The fine illustrated how courts view breaches of laws in this area. For more information on the prosecution, go to the following website:

[https://www.epa.nsw.gov.au/news/media-releases/2019/epamedia191220-court-fines-company-\\$132000-for-radiation-security-and-safety-breaches](https://www.epa.nsw.gov.au/news/media-releases/2019/epamedia191220-court-fines-company-$132000-for-radiation-security-and-safety-breaches)

Please email us if you wish to discuss Victoria's laws relating to the possession and transport of high consequence radioactive sources.

Radiation Advisory Committee

The annual report of the Radiation Advisory Committee (RAC) for the financial year 2019-2020 is now available at:

<https://www2.health.vic.gov.au/public-health/radiation/radiation-regulatory-framework/radiation-advisory-committee>

The 2019-2020 Annual Report summarises the work of the RAC during the year, including the provision of advice regarding: radiation safety requirements for CT based baggage scanners; guidelines for personal radiation monitoring service providers; Terms of Reference of the RAC; smoke detectors; and e-waste.

The term for appointment for the RAC is from August 2020 to August 2023. The RAC has members drawn from various fields, including radiation oncology, radiology, nuclear medicine, medical physics, and health physics. In this term, the Minister appointed two RAC members to replace two members who had resigned.

Mandatory testing of medical radiation sources

Because of the situation arising from the coronavirus (COVID-19), an email was sent on 16 April 2020 to relevant licence holders about the department's enforcement policy regarding compliance testing of prescribed radiation sources (used for human diagnostic purposes) and independent dosimetric auditing of linear accelerators used for medical radiotherapy. The email advised licence holders that the department would not take enforcement action if a prescribed radiation source was used between 30 March 2020 and 30 September 2020 for human diagnostic purposes without a current certificate of compliance in respect of that source, or if a linear accelerator was used between 30 March 2020 and 30 September 2020 for the purpose of medical radiotherapy without the independent dosimetric auditing requirements being satisfied in respect of that linear accelerator. Based on information that was available to the department during September 2020, this enforcement policy was not extended beyond 30 September 2020. However, licence holders are encouraged to contact the Radiation Team by email at radiation.safety@dhhs.vic.gov.au if they have concerns about their ability to comply with compliance testing requirements or linear accelerator auditing requirements.

Research project – Paediatric Diagnostic Reference Levels

A research project led by a university in Melbourne is investigating if radiation dose levels can be reduced without losing diagnostic capability by replacing the radiographic skeletal survey series with low-dose CT when investigating non-accidental injury in children. This research requires Diagnostic Reference Levels (DRLs) for paediatric X-ray examinations to be established. The collection of de-identified data from radiation practices that undertake paediatric imaging is necessary to establish these paediatric DRLs. All medical imaging radiation practices are welcome to participate in this research project. For further information regarding this research project, please contact Edel Doyle at edel.doyle@monash.edu

Disused sealed sources in storage

Management licence holders authorised to possess sealed sources need to note that they must apply to vary their licence if they wish to put the source into storage. Please email us if you would like guidance on this issue.

Further Information

For further information email radiation.safety@health.vic.gov.au or visit our website at

<https://www2.health.vic.gov.au/public-health/radiation>

Feedback

If you would like to provide any feedback on this newsletter or make any suggestions as to what you would like to see in future newsletters, feel free to contact us by email at radiation.safety@health.vic.gov.au