



a healthier world through  
sonographer expertise

17 May 2023

Australian Commission on Safety and Quality in Health Care  
Level 5, 255 Elizabeth Street  
Sydney NSW 2000

Emailed to: [cosmeticsurgery@safetyandquality.gov.au](mailto:cosmeticsurgery@safetyandquality.gov.au)

## **National Safety and Quality Cosmetic Surgery Standards – Public Consultation**

Dear Sir/Madam,

Thank you for the opportunity to provide feedback on the draft ACSQHC National Safety and Quality Cosmetic Surgery Standards.

The Australasian Sonographers Association (ASA) is the professional organisation for Australasian sonographers, who are the experts in ultrasound. With over 7,000 members, and representing more than 70% of Australasia's sonographers, the ASA's purpose is to foster a sonography profession that delivers high quality ultrasound with a vision to create a healthier world through sonographer expertise.

Sonographers are highly skilled health professionals who are strategically involved at the initial diagnostic stages of patient care and perform the majority of comprehensive medical diagnostic ultrasound examinations.

The ASA applauds the recent swift steps taken to better regulate the cosmetic surgery profession through the Australian Health Practitioner Regulation Agency (Ahpra) and the development of these draft Standards. However, the ASA is disappointed that similar enforceable national Standards have not been established for the sonography profession. Nevertheless, the absence of sonography standards is presently logical, as the majority of sonographers are not regulated under Ahpra.

Unlike other diagnostic imaging divisions of practice, sonography is not currently regulated as a profession, meaning there are no nationally enforceable standards of practice that set the minimum expectations of ultrasound examinations performed by sonographers in Australia, or recency of practice requirements protecting the public and preventing harm. The ASA is advocating the inclusion of all sonographers as an added title under Ahpra's Medical Radiation Practice Board (MRPBA) – a move that would benefit the quality of sonography, through the development of nationally enforceable clinical standards for all sonographers.

Only those sonographers dual-registered as radiographers or another diagnostic imaging profession, are included under Ahpra. 75% of the sonography profession is currently not regulated, meaning there is:

- No system to enforce national standards of practice for 75% of sonographers
- No recency of practice requirements
- No central complaint handling system.

The ASA is advocating the entire sonography profession be added to the existing MRPBA, protecting the public and preventing harm by having:

- Nationally consistent safeguards that assures patient safety and care
- A clear and effective central complaint handling process for patients
- An enforceable measure of the quality of ultrasound examinations provided by all sonographers



- Enforceable standards of practice and conduct that set the minimum expectations of all sonographers' practice
- Reduced red tape, with a single and complete regulatory system for all sonographers
- All sonographers regulated under the one system with other medical imaging practitioners.

This solution is practical and cost effective, as 25% of sonographers are already registered under the MRPBA; no new board is required, and existing frameworks are already in place.

Ultrasound is the most used medical imaging modality in Australia: 11.67 million Medicare-funded ultrasound services were provided to Australians in 2021-2022,<sup>1</sup> most performed by sonographers. The magnitude of ultrasound being undertaken and its importance to people's health, in everything from cancer diagnoses to pregnancy scans, cannot be overstated.

Sonography presents a high risk to patients with many exams considered intrusive in nature. In addition, sonographers tend to work autonomously, and are often alone with the patient.

The volume of ultrasound undertaken dwarfs the number of cosmetic surgery procedures in Australia, which amount to approximately 500,000 each year.<sup>2</sup> Cosmetic surgery is on a pathway towards greater regulation through Ahpra, while sonography stands out as an unregulated anomaly.

The Working Group for Sonographer Regulation – consisting of the ASA, Australasian Society for Ultrasound in Medicine (ASUM), Australian Sonographer Accreditation Registry (ASAR) and a senior sonographer representative – has produced a submission for sonographers to be included in the National Registration and Accreditation Scheme (NRAS) under the MRPBA. See the full submission at: <https://www.sonographers.org/advocacy/sonographer-regulation-in-australia>.

The approval of Health Ministers is required for all sonographers to be included under the MRPBA. As the ACSQHC is the body leading and coordinating national improvements in the safety and quality of health care, the ASA would be pleased to have further discussions with the ACSQHC regarding the sonography profession, and the development of much-needed enforceable national standards.

If you have any questions or require additional information, please contact Slade Carter, General Manager, Policy and Advocacy, at [policy@sonographers.org](mailto:policy@sonographers.org) or (03) 9552 0000.

Yours sincerely,

A handwritten signature in black ink that reads 'Jodie Long'. The signature is written in a cursive, flowing style.

**Jodie Long**  
Chief Executive Officer  
Australasian Sonographers Association

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<sup>1</sup> Medicare Statistics: [http://medicarestatistics.humanservices.gov.au/statistics/mbs\\_group.jsp](http://medicarestatistics.humanservices.gov.au/statistics/mbs_group.jsp)  
(Accessed April 2023)

<sup>2</sup> <https://www.afr.com/life-and-luxury/health-and-wellness/cosmetic-surgery-boom-is-new-face-of-covid-19-20200821-p55o0u>