the peak body and leading voice for sonographers

25 June 2020

Hon Dr David Clark
Minister of Health
PO Box 5013
Wellington 6140
New Zealand

Via email to steve.osborne@health.govt.nz

Dear Minister,

Thank you for the opportunity to provide feedback on the draft Terms of Reference and core standards for performance reviews of responsible authorities (RAs) in New Zealand.

With almost 7,000 members, the Australasian Sonographers Association (ASA) is the peak body and leading voice for sonographers in Australasia, representing 80 per cent of sonographers across Australia and New Zealand. The ASA upholds excellence in sonography and advocates for patient access to safe and quality medical diagnostic ultrasound.

The ASA recognises the importance of ensuring all RAs, including the Medical Radiation Technologists Board (MRTB), carry out their functions in a consistent, timely and impartial manner.

Following review by the ASA's Sonographer Policy and Advisory Committee, we offer the following feedback on the consultation document:

- Overall, the consultation document is comprehensive and provides logical alignment between the proposed performance review standards and functions of RAs. We note, however, the language is quite generic and heavy in places. The document would benefit from the inclusion of an appendix listing responsible authorities and associated professions.
- The ASA supports mechanisms that facilitate stakeholder consultation, including in setting the schedule, terms of reference and any detailed performance review requirements, as well as the appointment of an independent reviewer.
- The ASA requests that reviewers have a thorough understanding of the RA and associated profession(s) they are assessing. Disclosing the background of the reviewer would support the principle of improved transparency.
- We support the intent for the performance review to be "carried out in a collegial manner", together with opportunities for feedback to be provided to RAs, by RAs in response to any report findings, and opportunities for RAs to use feedback to facilitate professional development for its members.
- The ASA suggests including a requirement in the performance review process to seek feedback from the respective profession or industry peak body on the performance of the RA in question.
- The performance review process and all related requirements must not be onerous or expensive for the RAs; including the self-assessment, responding to feedback, and communication of information on the RA's website and in annual reports. Any additional cost will be passed on to practitioners and ultimately met by consumers. Further, the process should not

Level 2, 95 Queen Street, Melbourne VIC 3000 Australia
T: +61 3 9552 0008 E: policy@sonographers.org W: www.sonographers.org ABN: 64 991 983 051

negatively impact the timeliness or impartiality of outcomes by RAs regarding its intended functions.

Thank you for your leadership with this work. We look forward to hearing of the outcomes of this consultation and welcome the opportunity to provide further feedback on any detailed terms of reference or performance review requirements that specifically relate to the MRTB.

If you have any questions or require additional information, please contact the ASA Policy & Advocacy Advisor, James Brooks-Dowsett, by phone on +61 3 9552 0008 or email to policy@sonographers.org.

Yours sincerely,

**Ian Schroen**
President
The Australasian Sonographers Association