



The Royal Australian and New Zealand College of Radiologists®

The Faculty of Clinical Radiology

Coroner Simon McGregor
Coroner's Court of Victoria
65 Kavanagh Street
Southbank
VIC 3006

Via email: cpuresponses@coronerscourt.vic.gov.au

18 February 2022

Dear Mr McGregor

Investigation into the Death of Peta Hickey – COR 2019 002336

The Royal Australian and New Zealand College of Radiologists (RANZCR) is committed to improving health outcomes for all, by educating and supporting clinical radiologists and radiation oncologists. RANZCR is dedicated to setting standards, professional training, assessment and accreditation, and advocating access to quality care in both professions to create healthier communities.

RANZCR creates a positive impact by driving change, focusing on the professional development of its members and advancing best practice health policy and advocacy, to enable better patient outcomes. RANZCR members are critical to health services: radiation oncology is a vital component in the treatment of cancer; clinical radiology is central to the diagnosis and treatment of disease and injury.

This was a terrible and tragic event; RANZCR extends its sincere condolences to Ms Hickey's family and friends.

The College appreciates the opportunity to respond to the coroner's recommendations into the passing of Ms Peta Hickey. Every week, tens of thousands of contrast injections are performed at practices all around Australia. Every week, radiologists and practice staff treat many contrast reactions, including some life-threatening reactions, appropriately and safely. The inadequate management of a contrast reaction by one radiologist should not mean unnecessary requirements are placed on all radiologists and practices.

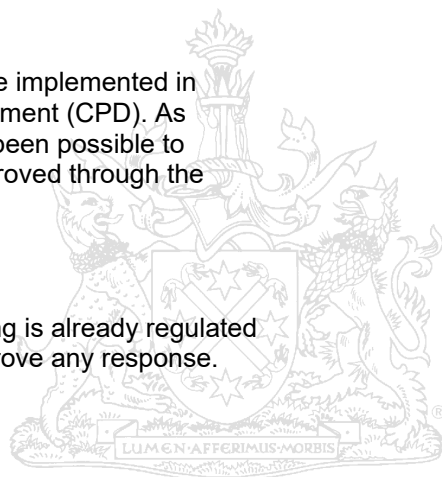
The Faculty of Clinical Radiology's Safety, Quality and Standards Committee, Professional Practice Committee, and Policy and Advocacy Unit have consulted with the relevant clinicians and carefully considered the recommendations from this inquest and respond as follows:

Recommendation 1

The College accepts this recommendation. It is anticipated that this will be implemented in 2022, as part of the ongoing changes to Continuing Professional Development (CPD). As changes will need to be made to the College's CPD platforms, it has not been possible to immediately make this change. This requirement will also need to be approved through the College's extensive Governance process.

Recommendation 2

The College does not accept this recommendation as resuscitation training is already regulated and the College believes additional training is unlikely to significantly improve any response.



Recommendation 3

The College does not accept this recommendation as this is not the role of the College. The Federal Government through the Therapeutic Goods Administration already has a centralised adverse reaction database.

Recommendation 4

The Coroner's recommendation is under consideration and will form part of the review of Iodinated Contrast Guidelines and associated resources, including the wall chart, during 2022. Wall charts need to present critical information clearly in a constrained size and format and are a memory aid, not a replacement for correct and current training. As all College guidelines are subject to a rigorous and comprehensive evidence-based review and rigorous governance, this will take longer than the three-month period given by the Coroner.

Recommendation 5

The Coroner's recommendation is under consideration and will form part of the review of RANZCR's Standards of Practice for Clinical Radiology, including Standard 5.3.2 which relates to referrals. The College's Standards are subject to stakeholder input and to a rigorous and comprehensive evidence-based review and rigorous governance which will take longer than the three-month period requested. The estimated release date of the updated Standards is June 2023.

It must be noted that whilst the College's Standards and Guidelines are best practice, they are not mandatory in Australia. The College has been advocating with Federal, State and Territory Governments for a number of years to implement the College's Standards as mandatory without success.

Recommendation 6

The College has not had the opportunity, within the time frame of the three months provided, to have an in-depth discussion with the Cardiac Society of Australia and New Zealand (CSANZ) regarding this recommendation. There is evolving evidence on this subject which will also need to be carefully considered. It may be that an alternative solution is required regarding CT *coronary* angiography and not *all* CT angiography, as this was the test being performed.

Recommendation 7

The College does not accept this recommendation as the scope is beyond its remit. Screening is a public health issue and forms part of government policy. However, a general statement outlining the principles of an effective screening program with emphasis on frequency of screening imaging, clarity of literature and relative patient risk could be developed and will be considered as part of recommendation six.

Recommendation 8

The Coroner's recommendation is under consideration and will form part of the review of RANZCR's Standards of Practice for Clinical Radiology. The College's Standards are subject to stakeholder input, a rigorous and comprehensive evidence-based review and rigorous governance. This will take longer than the three-month period requested. The estimated release date of the updated Standards is June 2023. As with recommendation five, the College's Standards, whilst best practice, are not mandatory within Australia.

Recommendation 11

The College does not accept this recommendation as it is not within its scope to develop or implement a training and certification programme for radiographers. It should be noted that RANZCR's Standards of Practice for Clinical Radiology require the following qualification for a radiographer: 4.2.2 A radiographer must have any licences and current professional registration required for the jurisdiction(s) in which he/she is practising, including any radiation operator's licences required for use of ionising radiation. The third indicator of this requirement relates to the recommendation: (iii) The Practice should ensure that radiographers have complete CPR training according to the Australian Resuscitation Council or New Zealand Resuscitation Council's guidelines on Basic Life Support, and CPR; and the Practice maintains a register of the training completed and training expiry dates for all radiographers.

<https://www.ranzcr.com/documents/510-ranzcr-standards-of-practice-for-diagnostic-and-interventional-radiology/file>

Recommendation 12

The College does not accept this recommendation as it is not within RANZCR's scope to amend the scope of practice for radiographers, but RANZCR would consider working with the MRPB and ASMIRT on proposals they may develop. RANZCR's position is that radiographers are not trained in the safe and effective use of medicines, except for IV contrast and medications used for imaged guided injections. Radiographers should continue to, with the scope of medical radiation practice, apply knowledge of safe and effective use of medicines to practice under the supervision of a clinical radiologist.

<https://www.ranzcr.com/documents/4897-ranzcr-submission-to-mrpb-consultation-on-professional-capabilities-for-medical-radiation-practitioner-consultation/file>

Recommendation 15

- (a) This recommendation will be considered as part of the Iodinated Contrast Guideline review.
- (b) This recommendation will be considered as part of the Standards of Practice review.
- (c) The College does not accept this recommendation as this is covered in Medical Imaging Informed Consent Guidelines 3.1.
- (d) The College does not accept this recommendation as it is not within the College's scope to decide on radiographer training or accreditation, except in the context of ongoing quality.
- (e) & (f) These recommendations will be considered when updating the Standards of Practice for Clinical Radiology and consulting with key stakeholders during the update processes in practice.
- (g) This recommendation will be considered as part of the Iodinated Contrast Guideline review.

As with recommendation five, it must be noted that whilst the College's Standards and Guidelines are best practice, they are not mandatory in Australia. The College has been advocating with Federal, State and Territory Governments for a number of years to implement the College's Standards as mandatory without success.

Recommendation 17

The Coroner's recommendation is under consideration. The DIAS Advisory Committee comprises part time appointees with technical expertise and experience in the sector. The DIAS Advisory Committee was overseen by the Department of Health and has recently been transferred to the Australian Commission on Safety and Quality. RANZCR has been advocating with the Department for a number of years to bring the DIAS standards into line with RANZCR's standards and will continue to do so with the Commission.

In the event that the two relevant recommendations are implemented (recommendations 15 and 16), the College is open to working with other organisations in the sector to consider the best means of communicating with radiologists.

We hope that this feedback from RANZCR is useful to you and thank you again for the opportunity to respond to the recommendations.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gerard Goh', with a stylized flourish at the end.

A/Prof Gerard Goh

Royal Australian and New Zealand College of Radiologists