The Royal Australian and New Zealand College of Radiologists®

The House Standing Committee on Employment, Education and Training
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RANZCR Submission to the Standing Committee on Inquiry into the Digital Transformation of Workplaces

The Royal Australian and New Zealand College of Radiologists (RANZCR) welcomes the opportunity to provide feedback to the House Standing Committee on Inquiry into the Digital Transformation of Workplaces.

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 members are critical to health services: clinical radiology (CR) is central to the diagnosis and treatment of disease and injury and radiation oncology (RO) is a vital component in the treatment of cancer.

RANZCR commenced work on the impact of artificial intelligence (AI) in 2017, and has published work relating to ethics, standards of practice, regulation, autonomous AI, generative AI, and upskilling resources to assist our members adapt to new technologies. Due to the nature of our work, our response centres on the impact of AI adoption on healthcare professions.

Following consultation with our artificial intelligence, digital health and workforce committees, RANZCR would like to draw attention to the following points:

a) The benefits for productivity, skills development, career progression and job creation in Australia-

The delivery of healthcare in Australia faces increasing service demands, increasing costs, and a skilled workforce shortage. Adoption of clinically proven AI tools, with appropriate oversight, provides the potential to improve the quality and efficiency of healthcare delivery in Australia at lower cost. AI holds transformational potential, particularly to streamline routine tasks, minimise clinician workload, automate quality improvement, and perform administrative tasks.

From a digital health perspective, the Fast Healthcare Interoperability Resources (FHIR) implementation program alludes to improving healthcare productivity. Through enhanced communication, reduced delays, minimised duplication, and streamlining testing, it aims to create a more efficient system. Enhanced referral data will also facilitate AI driven management of exam scheduling, triage, and protocol optimization.

b) The role of business software and regulatory technology ('Reg Tech') in improving regulatory compliance in the workplace relations system, including their use by regulators, and accountability for errors resulting in non-compliance-

Medical devices including software as a medical device with encapsulates AI is regulated in Australia by the therapeutic Goods Administration. The TGA assess SaMD on a technology agnostic risk-based model, which is a system used by various jurisdictions internationally and considered appropriate by RANZCR.
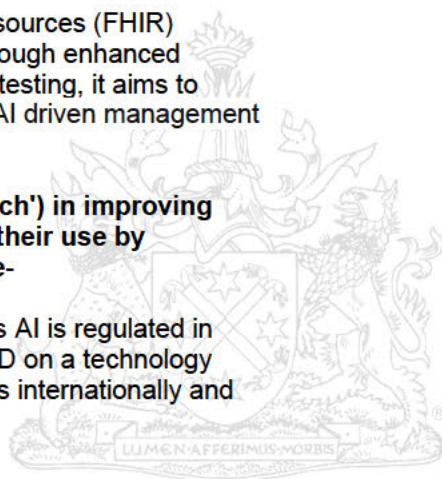
Failure of AI resulting in poor patient outcomes has not yet been medicolegally tested within this jurisdiction, although considerations must be made towards the responsibility shared between the clinician, the developer and the site that implemented the AI.

While RANZCR advocates for robust regulation in the medical AI space where there is the potential to cause patient harm, it recognises the need to strike a balance in which we can develop an environment that fosters innovation, growth, a workforce that is AI 'literate', and rapid adoption of AI in healthcare.

c) the risks, opportunities, and consequences for the nature of work, including effects on hiring, rostering, work intensity, job design, wage setting, monitoring, surveillance and job quality;

AI technologies can be disruptive. As the role of workers is redefined in an AI enabled world, careful workforce planning is necessary to ensure that staff have the skills to harness these technologies for their career and wider societal benefits. There must be support available for workers to adapt and grow alongside the technology.

Within healthcare, the adoption of automation carries the risk of clinicians becoming excessively passive or functionally bypassed. This could lead to boredom, de-skilling, and ultimately a loss of status, perceived work value, and remuneration.

To mitigate these risks, careful attention to workflow redesign is essential. Some key considerations to include are-

- An "AI-literate" workforce that understands how AI can integrate into workflow, along with its benefits and potential risk of patient harm,
- AI system should produce results that are explainable.
- AI tool should prompt users for more complete reports appropriate to request/findings.
- There should be provision for users to over-ride AI with justification.

e) Appropriate safeguards or regulatory interventions to guide responsible implementation in the workplace, including the digital skills and resources necessary for employers to appropriately utilise these technologies-

When utilising AI, businesses should have accountable governance to oversee implementation and monitoring of performance and use to ensure they are compliant with applicable standards and legal requirements.

Regulatory agencies should develop guidance resources and tracking templates to assist businesses in meeting their regulatory requirements.

f) Effects on gender equality, job security, small businesses, closing the gap and disadvantaged and vulnerable cohorts of workers-

Issues arise when AI is trained on data that is biased. When developing and training AI tools developers must be cognisant of bias in their data and take appropriate measures to mitigate this.

Bias in algorithmic design should be minimised by consciously avoiding prejudice and by involving a range of people with different perspectives and skill sets in the design process. AI tools are limited by their algorithmic design, interpretation process and the data they have

access to making them prone to bias. AI tools trained on greater volumes and varieties of data should generally be less biased.

RANZCR believes that artificial intelligence can benefit businesses and societies, provided that it is implemented and overseen carefully. If changes are to be made in the regulatory space, guidance must be issued. This guidance will need to encapsulate the features of AI, and the processes involved in ensuring it works safely - constant evaluation of the data, ability for machine self-learning, ability for quality assurance and testing of data and outcomes.

End users must be able to understand the outputs and limitations of the system. Matters such as who owns and controls the data, privacy, and consent must be considered at a national level when the uptake of AI tools on a wide scale is being considered.

Yours Sincerely

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