

Document Control Report

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|--|------------------------|--|--|
| Title | | | |
| Scope of Entitlement Standard Operating Procedure | | | |
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| 1.1 | Nov 2017 | | Amendments following IRMER inspection |
| 2.0 | Sept 2020 | Final | Reviewed and amended to include updated regulations; names of operators removed and link to list of operators added. |
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G:\Radiology Public Drive

Local Path

Radiology Clinical Governance /Policies

Filename

Standard Operating Procedure Scope of Entitlement

Categories for Trust's internal website

Diagnostic Imaging Trust's internal website

Tags for Trust's internal website

Referral, Referrer, Practitioner, Operator

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1. Introduction

The Trust as Ionising Radiation (Medical Exposure) Regulations [IR(ME)R] Employer is responsible for ensuring that policies and procedures are in place to identify individuals entitled to act as Practitioners, Operators and Referrers and to their direct working practices in order to minimise the risks associated with the use of ionising radiation in clinical practice.

2 Purpose

IR(ME)R legislation is made as criminal law not civil law and any person carrying out a function as a duty holder (Employer, Practitioner, Operator and Referrer) has a personal legal responsibility to comply with the legislation. Breaches are a criminal offence.

3 Scope and Location

This Standard Operating Procedure (SOP) is written to clarify the roles, responsibilities and entitlements of Practitioners, Operators and Referrers working in Radiology Departments across the Northern Devon Healthcare NHS Trust.

4 Equipment

- Referral criteria available for Referrers: iRefer (available in booklet format, on-line, or as I-phone app).
- Radiology Department Imaging Request forms (paper or electronic)
- All Radiology imaging equipment on the above sites including General and A+E x-ray units, AMX Mobile imaging machines, Dental imaging equipment, Mobile Image Intensifiers, Interventional fluoroscopy equipment, CT and DEXA.
- Lists of entitled Practitioners, Referrers, Operators and their associated duties (scope of entitlement) at NDHT

5 PERSONNEL IDENTIFICATION

Employer: Any natural or legal person who carries out (other than as an employee), or engages others to carry out medical exposures or practical aspects, at a given radiological installation.

Practitioner: A registered healthcare professional who is entitled, in accordance with the employer's procedures, to take responsibility for an individual medical exposure. The primary role of the practitioner is to justify medical exposures.

Operator: An Operator carries out the practical aspects of an exposure. An Operator does not have to be a registered healthcare professional, but is required to be adequately trained for their scope of practice as detailed in Schedule 2 of the IR(ME)R Regulations.

Operators are:

- HCPC Registered Radiographers
- Student Radiographers on official placement in the department may undertake practical aspects of an examination under the supervision of a Radiographer.
<G:\radiology\STUDENTS\Student Policies and SOPs\University of Exeter Supervision policy.docx>
- Trainee Assistant Radiographer Practitioners
- Assistant Radiographer Practitioners
- Any Medical Physicist /Technician engaged by the Trust and in possession of a certificate of competence to act as an Operator issued by the Head of Diagnostic Radiology Physics (under SLA with Royal Devon Exeter Foundation Trust).
- Manufacturer's service engineers working under the Trust Handover Procedure.
- Application specialists working under the supervision of a superintendent radiographer or radiologist.
- Any Other trained Radiographers/Radiologists working in the Trust, listed (alongside other operators) and working under their own specific Scope of Practice.
- Any 2nd year Student Radiographers working as an Assistant Practitioner in the department, on receipt of their Cert HE, may undertake practical aspects of an examination under the supervision of a radiographer.
- Any Orthopaedic Surgeon or Other Healthcare Professional who has been adequately trained, is documented as competent and is working in accordance with the Local Rules and IR(ME)R procedures for the Mini C-arm.
- Any (CT) Assistant Practitioner employed by the Trust and working under the strict supervision of a Radiographer may make exposures for specific basic CT scans, following documented training, and in accordance with their scope of practice, both as a trainee and once qualified.
- Any Associate Apprentice Mammographer employed by the Trust working under the supervision of a Radiographer, both as a trainee and once qualified may undertake the practical aspects of an examination in accordance to their scope of practice.

Referrer: Any registered medical or dental practitioner.

A registered non-medical healthcare professional that is entitled, in accordance with the employer's procedures, to refer individuals for exposure to ionising radiation for diagnostic imaging procedures.

Note: Any request for diagnostic imaging that has not been completed by a recognised referrer, must be passed to the liaison Radiologist who may then decide to act as referrer

6.0 OPERATIONAL OBJECTIVES FOR DUTY HOLDERS

- 6.1** Duty holders (Practitioners, Operators and Referrers), must have appropriate professional qualifications*, registration, and experience for their role and must in addition undertake the Trust's on-line IR(ME)R training, updating it every three years to maintain competence.
- *Practitioner's and Operator's qualifications to include training according to Schedule 2 of the IRMER procedures
- 6.2** Training records for Practitioners, Operators and Referrers are maintained by the Governance Lead for Radiology; however duty holders are also responsible for maintaining their own personal training and CPD records containing evidence of their training and continuing professional development.
- 6.3** The Lead Clinician for Clinical Radiology (the Entitler) may delegate the task of justification and authorisation for some medical exposures to individual, experienced radiographers. These exposures are clearly identified and documented in the local imaging protocols and individual entitled radiographers are issued with a signed certificate of which confirms their entitlement to carry out this task.
- 6.4** The scope of entitlement for operators and referrers may change as roles develop over time and individual certificates will need to be updated and signed by the Lead Clinician.
- 6.5** The Governance Lead for Radiology will monitor and maintain lists of entitled Duty Holders for the department.
- 6.6** The suitability and impact of referrals will be audited on a regular basis and action will be taken to address issues that could compromise the overall quality of patient care.
- 6.7** All processes regarding referrals should be reviewed on at least an annual basis.
- 6.8** All practitioners, referrers and operators must comply with the Employer's procedures.
- 6.9** Medical Physics Experts (MPE) are entitled on appointment and therefore should only be appointed if they are adequately trained for this specific role.
- 6.91** Medical Physicists/Technologists will be entitled as operators and their training records must be provided to the employer on request.
- 6.92** **Electronic Referrals: not currently in use. See SCoR guidance when necessary**

7. DUTY HOLDERS: REFERRERS

Medical and Non-medical referrers should adhere to the Standard Operating Procedure Making a Referral for Diagnostic Imaging for procedures involving the use of ionising radiation.

- 7.1 There is no legal requirement within the Regulations that medical / non-medical referrers are trained in radiation safety / IRMER awareness prior to being entitled to act as referrers; however it is normal practice for Radiology Departments to require such training to be undertaken.

IR(ME)R Training for Medical and Non-Medical Referrers is available via the Trust's e-learning platform 'STAR'. Modules covered are indicated below.

7.2 Medical Referrers

| | |
|------------------------|--|
| IRMER module 03 | Legal Requirements – Regulations <ul style="list-style-type: none"> • Ionising Radiation (Medical Exposure) Regulations 2017 - IR(ME)R 2000 03_01_02 |
| IRMER module 01 | Radiation Hazards and Dosimetry <ul style="list-style-type: none"> • Risks v Benefits in Patient Exposure 01-02-05 • Use of Medical Exposures in Special Circumstances 01-03-01 |

7.2 Non-medical Referrers

| | |
|------------------------|---|
| IRMER module 03 | Legal Requirements – Regulations <ul style="list-style-type: none"> • Ionising Radiation (Medical Exposure) Regulations 2017 - IR(ME)R 2017 03_01_02 |
| IRMER module 01 | Radiation Hazards and Dosimetry <ul style="list-style-type: none"> • Biological Effects of Radiation 01-02-01 • Examples of Radiation Dose 01-02-04 • Risks v Benefits in Patient Exposure 01-02-05 |
| | Special Circumstances <ul style="list-style-type: none"> • Use of Medical Exposures in Special Circumstances 01-03-01 |
| IRMER module 02 | Management and Radiation Protection of the Patient <ul style="list-style-type: none"> • Patient Selection The Justification of Patient Exposure 02-01-01 |

Registered Nurses and Allied Health Professionals (non-medical Referrers) must contact the Radiology Department for an application form if their job role requires them to refer patients for diagnostic imaging.

Application forms must include evidence of continuing professional development which demonstrates that the applicant is sufficiently competent in patient assessment, history taking and decision making, to supply pertinent medical data to enable the Practitioner to 'justify' the exposure.

Applications from non-medical referrers will be considered at scheduled monthly Radiology Management Group (RMG) Meetings.

Non-medical referrers must understand their professional accountability arising from their professional code of conduct and any medico-legal issues related to their scope of practice and complete the IRMER awareness training modules on STAR to inform them of the risks associated with exposure to ionising radiation.

The Radiology department must have evidence of successful completion of the IRMER training modules (see below) before non-medical referrers can be appointed as Duty Holders and entitled to act as 'Referrers' at NDHT. Once entitled, the referrer functions should be added to the individual's job description or specified Scope of Practice.

(Nb. The Workforce Development Department provides the Radiology Department with a monthly print out of completed modules).

7.3 Referrers Duties

See hyperlink above: [SOP Making a Referral for Diagnostic Imaging](#)

8.0 COMPETENCE

Practitioners, Operators and Non-medical Referrers are required to complete the IR(ME)R modules on STAR once every 2 years.

An on-going departmental programme of competency assessment is in place for operators who will be assessed by an appropriately trained person.

The quality of referrals from medical and non-medical referrals is monitored regularly as part of the Radiology Department's audit programme

IR(ME)R ENTITLEMENTS – Qualifications and Training Required

North Devon District Hospital
RADIOLOGY DEPARTMENT

Qualifications, experience and training required for individuals to perform duty holder roles at North Devon District Hospital as agreed by the Lead Clinician for Radiology

| Staff Group | IRMER Duty Holder Scope of entitlement | Qualifications/ Training/Experience Required |
|--------------------------------|---|--|
| Medical Consultant | Referrer | GMC Registration FRCP/FRCS |
| Consultant Radiologists | Practitioner Referrer Operator | GMC registration FRCR |
| General Practitioners | Referrer | GMC Registration |
| Hospital doctor | Referrer | GMC Registration |
| Dental Surgeons | Referrer | GDC Registration |
| | Practitioner | GDC Registration + undergraduate Dental degree Undergraduate Dental degree |
| | Operator | + Equipment training |
| Radiographers | Operator | According to local imaging protocols. |
| | Practitioner* | HCPC Registration + Post graduate training |
| | Referrer* | *by entitlement. Individual to hold certificate of entitlement and refresh IRMER training every 2 years. |
| Mammographers | Operator | According to local imaging protocols |
| | Practitioner* | HCPC Registration +post graduate training |
| | Referrer* | *by entitlement. Individual to hold certificate of entitlement and refresh IRMER training every 2 years. |
| Assistant Practitioners | Operator | Accreditation with Society and College of Radiographers + IRMER training every 2 years |
| Student Radiographers | Operator | Registration on undergraduate medical imaging programme |
| Emergency practitioners /nurse | Referrer | NMC Registration + Post graduate training + IRMER Awareness training |
| Physiotherapists | Referrer | HCPC Registration + Post graduate training + IRMER Awareness training |
| Podiatrists | Referrer | HCPC Registration + Post graduate training + IRMER Awareness training |
| Speech and language therapists | Referrer | HCPC Registration + Post graduate training +IRMER Awareness training |
| | Operator | - |
| Cardiologists | Referrer | Membership of RCP and GMC registration |
| Medical Physicists | Operator | TBC |

IR(ME)R Entitlement – Scope of Referrals for Non-medical Referrers

RADIOLOGY DEPARTMENT GROUP ENTITLEMENT

NON-MEDICAL REFERRERS at NDHT

| Staff Group | Scope of Entitlement - Referrers |
|--|--|
| Extended Scope Physiotherapists (ESP) Back care | Plain film imaging of the pelvis and lower limb DEXA scans CT (in consultation with a radiologist) MRI |
| ESP Hip and Knee Practitioners | Pelvis and lower limb |
| Emergency Nurse Practitioners (Nurse Practitioners only may request for NOF pathway and CXRs) | NOF pathway Pelvis / hip |
| | Chest x-rays |
| | Appendicular Skeleton / Soft Tissue Neck / Foreign Body demonstration |
| Podiatrists | Lower limb |
| Postural Management Physiotherapists | Pelvis |
| Radiographers | Orbits for foreign bodies / Lateral skull for MRI LVA (DEXA), Mammograms |
| Respiratory Nurses | Chest x-rays |
| Rheumatology Nurses | Chest x-rays |
| Clinical Nurse Specialist (Breast) | Mammograms |
| Speech and language therapists | Video fluoroscopy |

An up to date list of named non-medical referrers is held by the Radiology Department Governance Lead

<G:\Radiology Clinical Governance\IRMER\Lists of Entitled Referrers, Practitioners and Operators>

IR(ME)R Scope of Entitlement for Medical Referrers

**RADIOLOGY DEPARTMENT GROUP ENTITLEMENT for
MEDICAL Referrers
At North Devon District Hospital**

| Staff Group | Scope of Entitlement - Referrers |
|---------------------------------|---|
| All Consultants | All imaging procedures. |
| Medical Staff | All imaging procedures according to local protocols and under the supervision of their Consultant |
| Maxillofacial / Dental Surgeons | Imaging according to local protocols |
| Physician Associates | No entitlement to refer for imaging. |

Referrals for medical exposures shall be made in accordance with documented **Referral Criteria**.

The criteria to be used by the Trust will be based on those provided in the ***"iRefer - Making the best use of clinical radiology"*** document, published by the **Royal College of Radiologists**. This is available via the radiology pages of the Trusts website.

An up to date list of named Medical and Dental Consultant referrers is held by the Radiology Department Governance Lead.

[\\Nds.internal\public\Radiology Clinical Governance\IRMER\IR\(ME\)R Procedures - Standard Operating Procedures\APPENDIX A Medical and Dental Referrers.docx](\\Nds.internal\public\Radiology Clinical Governance\IRMER\IR(ME)R Procedures - Standard Operating Procedures\APPENDIX A Medical and Dental Referrers.docx)

**RADIOLOGY DEPARTMENT ENTITLEMENT
List of IR(ME)R OPERATORS**

All Duty Holders MUST be adequately trained and should undertake IR(ME)R refresher training every 3 years. This training is provided on-line on STAR (see My Learning Page for Radiographers) or can be undertaken at another Trust.

The list of IR(ME)R Operators is kept by the Radiology Governance Lead and is available [here](#).

RADIOLOGY DEPARTMENT ENTITLEMENT

List of IR(ME)R OPERATORS (Medical Physics)

Medical Physics Experts engaged as Operators at the Northern Devon Healthcare Trust must have been adequately trained for the role and undertake continuing education and training.

| Name | Entitlement | Speciality | Latest IRMER Training |
|----------------------|-------------|-------------------|--------------------------|
| EDWARDS Paul | Operator | Medical Physicist | 16/10/17 |
| FARWELL Joseph | Operator | Medical Physicist | 16/10/17 |
| HOARE Jackie | Operator | Medical Physicist | 16/10/17 |
| O'BRIEN Helen | Operator | Medical Physicist | 16/10/17 |
| CHAMBERLAIN Fiona | Operator | Medical Physicist | |

For Justification and Authorisation procedures, please follow the link below:

[\\Nds.internal\public\Radiology Clinical Governance\IRMER\IR\(ME\)R Procedures - Standard Operating Procedures\IR\(ME\)R Procedure 5 - SOP for justification and Authorisation\[646\] 2nd Nov.docx](#)