

## **TRANSFER OF PUBLIC VOLUNTARY REGISTER OF SONOGRAPHERS (PVRS) TO THE REGISTER OF CLINICAL TECHNOLOGISTS (RCT).**

### **FREQUENTLY ASKED QUESTIONS, FOR SONOGRAPHERS CURRENTLY LISTED ON THE PVRS.**

**Please note that the SCoR and RCT will publish updated guidance on transfer arrangements when available that is additional to and supplements these FAQs.**

**December 1<sup>st</sup> 2020**

#### **1. Why is the PVRS closing on February 28<sup>th</sup> 2021?**

It was a recommendation of the Professional Standards Authority (PSA) in their July 2019 report to Health Education England on the regulation of sonographers<sup>1</sup> that the Public Voluntary Register of Sonographers (PVRS) seek PSA accreditation or should transfer to an existing PSA accredited register. Statutory regulation for sonographers was not recommended at the current time although it was recognised in the PSA report that this situation may change in the future.

#### **2. What is a Professional Standards Authority (PSA) accredited register?**

The Professional Standards Authority (PSA) are an independent organisation accountable to the UK Parliament. Their work helps Parliament monitor and improve the protection of the public and ensure their health and wellbeing. They regulate and monitor the work of the nine UK statutory regulators and accredit voluntary registers that register health and social care professionals.

Information on PSA accredited registers is available at:

<https://www.professionalstandards.org.uk/what-we-do/accredited-registers> Organisations wishing to apply for PSA accreditation of their register have to follow a rigorous application process which includes public consultation.

#### **3. How is a PSA accredited register such as the RCT different from the PVRS?**

The PVRS and RCT are both voluntary registers. The RCT is PSA accredited whereas the PVRS is not. Accredited registers need to meet a number of standards and requirements, in many ways they have to meet the same standards as the statutory regulators to obtain PSA accreditation. These include a Fitness to Practise process in the event of complaints against registrants and a management board that is arm's length from any associated professional body. The PVRS which is administered directly by the College of Radiographers meets many but not all of the PSA requirements for accreditation. The PVRS is too small in register terms for the College of Radiographers itself to justify the high costs of applying for PSA accreditation. The PSA accredited Register of Clinical Technologists will be better able to protect the public going forwards than can the PVRS, whilst keeping the costs as low as possible for registrants.

#### **4. Why should I consider transferring to the PSA accredited Register of Clinical Technologists?**

If you are a sonographer whose professional background is such that you are not able to achieve statutory registration with (for example) the Health and Care Professions Council, Nursing and Midwifery Council or General Chiropractic Council the RCT register will likely be the most appropriate register available to you when the PVRS closes on February 28<sup>th</sup> 2021. Vascular specialist sonographers not holding statutory registration with the HCPC as a clinical scientist or radiographer may be able to apply also to join the PSA accredited register run by the Academy for Health Care Science. <https://www.ahcs.ac.uk/the-register/joining-the-register/>

**5. Do I have to be listed on a statutory or accredited register such as the RCT to be employed or work as a sonographer?**

No. The title of sonographer is not protected and there is no legal requirement to be listed on either a statutory or accredited register to work as a sonographer. Employers may increasingly ask that sonographers are listed on an accredited register such as the RCT if they are not able to achieve statutory registration.

**6. What will happen with respect to the long-standing SCoR policy for sonographers to achieve statutory regulation?**

The Society and College of Radiographers (SCoR), British Medical Ultrasound Society (BMUS), Consortium for the Accreditation of Sonographic Education (CASE) and the Royal College of Radiologists (RCR), along with other stakeholders, will continue to strongly press the case at all levels within government and the Department of Health and Social Care for the statutory regulation of sonographers. One of the aims of the RCT is to also obtain statutory regulation for their registrants. Government policy since 2011 has been set against bringing new groups into statutory regulation unless there are compelling reasons so to do.<sup>2</sup> See also FAQ 1 which refers to the July 2019 PSA report to Health Education England on the regulation of sonographers.<sup>1</sup> The SCoR, BMUS, CASE and RCR response to the PSA report was made publically available<sup>3</sup>. There has been a recent HCPC statement (November 19<sup>th</sup> 2020) outlining its position on the registration of sonographers<sup>4</sup> following broadcast of a [BBC news piece](#) on private baby scanning provision.

**7. I am both statutorily registered and listed on the PVRs. Should I apply to transfer?**

The RCT is a PSA accredited register. Transferring will help to increase the numbers of sonographers on the RCT which helps to support the case for statutory registration. Fitness to Practise referrals could be made to both statutory and accredited registers. The SoR strongly recommends that no one holding statutory registration should give this up in favour of joining a voluntary register as a replacement. The question over whether to transfer from the PVRs to the RCT *in addition* to statutory registration is your decision. There will be a fee payable, please see question 10.

**8. I am registered with the General Medical Council (GMC) and also listed on the PVRs. Can I transfer?**

It was not possible to apply to the PVRs if statutorily registered with the GMC *with* a licence to practice. The PVRs did accept applications if statutorily registered with the GMC *without* a licence to practice and you can transfer to the RCT if you wish, should you be in that latter category.

**9. How do I transfer to the RCT register?**

As long as your name is currently listed on the PVRs at the time of transfer this will be very straightforward. It will not be necessary to make a new application to the RCT. A short transfer application form will need to be completed along with payment of the required fee.

**10. Is there a fee and how can this be paid?**

The RCT will not be charging any application fees for those who wish to transfer. However all those who transfer across will be required to pay the annual renewal fee, which for 2021 is set at £26. The RCT works to keep costs as low as practical so the fee is intended to cover the costs of running the register. The fees are due annually every January and a direct debit will need to be set up if you choose to transfer across.

**11. Will I still be able to refer to myself as a sonographer?**

Yes. The RCT will recognise the title and there will be defined application routes and information on the RCT website for sonographers.

**12. How can I find further information on the RCT register?**

The RCT website is at <http://therct.org.uk/> The RCT also publishes a regular newsletter to update registrants.

**13. How long is the registration cycle on the RCT register?**

One year. The registration cycle runs from January to December

**14. Will I get a registration certificate from the RCT?**

Yes. There is also a public search facility at <http://therct.org.uk/>

In addition to this all RCT registrants are eligible to use the post nominals RCT to identify themselves as being on the register.

**15. Will I get a registration number from the RCT?**

Yes. If using this on a report the wording should be agreed locally so it is clear to the referrer and the public what the registration number refers to. See Royal College of Radiologists guidance at: <https://www.rcr.ac.uk/posts/position-statement-recording-identity-healthcare-professionals-who-report-imaging>

**16. What will happen with respect to the Continuing Professional Development (CPD) audit which would have been associated with PVRS renewal, had it gone ahead in March 2021?**

The RCT carries out an annual CPD audit in which a percentage of registrants are selected for audit. This is a percentage of the entire register and is not separated by profession. The RCT has a wealth of information to help you pass the CPD audit and offers webinars for those who have been selected. Sonographers transferring from the PVRS to the RCT will become eligible for CPD audit selection from 1st January 2022. It is important to maintain CPD records as the audit will include the time from the date of transfer. <http://therct.org.uk/information-for-registrants/cpd/>

**17. What other benefits do I get from being on the RCT?**

The RCT is not a professional body and as such does not offer benefits such as journals or CPD events. The fees charged are intended to only cover the cost of running the register and are set accordingly. By registering with the RCT you are joining an accredited register by demonstrating you have the relevant training, education, and experience to be competent to perform your role.

**18. How long will the transfer 'window' be open for?**

The RCT will open to transfers from 11th January 2021, it will not be necessary to wait until the PVRS closes at midnight on February 28th 2021. You are encouraged to apply to transfer as soon after January 11th as possible. The transfer window will close at midnight on 30th April 2021. After that date it will be necessary to make a new application to the RCT. If you do not hold RCT primary route qualifications this will need to be via the RCT equivalence route. Please note that the period between the PVRS closing at midnight on February 28th 2021 and your RCT transfer being finalised

will be a period in which you are not voluntarily registered. Please therefore apply to transfer as soon as possible after 11th January 2021.

**19. Will new applications to the RCT be possible?**

Yes. These will follow the published application procedures at <http://therct.org.uk/>

**20. Is there any Professional Indemnity Insurance associated with the RCT voluntary registration?**

There is no Professional Indemnity Insurance (PII) associated with RCT registration. This must be obtained via an employer, membership of a professional body (see FAQ 21) or an insurance company.

**21. Is RCT registration separate to SCoR membership?**

Yes. Registration with a register such as the PVRS or RCT is completely separate to membership of a professional body such as the Society and College of Radiographers (SCoR). Existing SCoR members will continue in SCoR membership if they transfer from the PVRS to the RCT. Sonographers listed on a statutory or accredited register and if not already SCoR members can apply for Associated Professional (full) membership of the SCoR. Benefits of membership which include Professional Indemnity Insurance (conditions apply) are at: <https://www.sor.org/being-member>

**22. Are there legal restrictions on registrants of accredited registers who are not also statutorily registered.**

Yes. Unless statutorily registered you cannot act under Patient Group Directions for the administration of drugs and medicines and cannot train to become supplementary or independent prescribers. You are allowed to act under Patient Specific Directions, but employers requiring you to act under these directions must ensure they you are competent to do so safely. Even if also statutorily registered it is important to confirm the regulations as they apply to you.

Unless also statutorily registered and with the required permissions you cannot act as a referrer for clinical imaging examinations involving the use of ionising radiation.

**23. I am listed on the PVRS with a preceptorship annotation. Can I transfer to the RCT?**

It will not be possible to transfer to the RCT with the preceptorship annotation in place. The SCoR will be contacting those holding the annotation individually to explain how it can be removed.

**References**

1. Right touch assurance for sonographers based on risk of harm arising from practice. A report to Health Education England. Professional Standards Authority. July 2019.  
[https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance-for-sonographers-a-report-for-hee.pdf?sfvrsn=9cfd7420\\_13](https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance-for-sonographers-a-report-for-hee.pdf?sfvrsn=9cfd7420_13)
2. Regulating further professions. Health and Care Professions Council  
<https://www.hcpc-uk.org/about-us/who-we-regulate/regulation-of-further-professions/>
3. No statutory regulation for sonographers: Society expresses disappointment and dismay. July 4<sup>th</sup> 2019  
<https://www.sor.org/eazines/sornews/issue-112/no-statutory-regulation-sonographers-society-expresses-disappointment-and-dismay>

4. HCPC statement on its position on the regulation of sonographers. 19<sup>th</sup> November 2020

<https://www.hcpc-uk.org/media-centre/position-statements/hcpc-outlines-position-on-the-regulation-of-sonographers/>