



# SCoR

THE SOCIETY & COLLEGE  
OF RADIOGRAPHERS

## **Student radiographers & trainee assistant practitioners as “Operators” under IR(ME)R 2017 (2018 in Northern Ireland)**

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# Contents

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Summary	3
Background	3
Society & College of Radiographers Guidance	4
Conclusion	5

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## Summary

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This statement explains the advice given by The Society & College of Radiographers that student radiographers and trainee assistant practitioners should not be entitled as “Operators” under the Ionising Radiation (Medical Exposure) Regulations 2017 (2018 in Northern Ireland). Both Regulations will be referred to as IR(ME)R in the rest of this guidance.

## Background

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It has come to the attention of the Society & College of Radiographers that some student radiographers and trainee assistant practitioners have been listed as one of the IR(ME)R duty holders (‘Operators’) under the relevant IR(ME)R Employers Procedures within clinical imaging and radiotherapy departments. The definition of Operator is stated in IR(ME)R as ‘any person who is entitled, in accordance with the employer’s procedures, to carry out practical aspects of an exposure’. This is different from anyone who acts under the direct supervision of a person who is adequately trained.

The Society & College of Radiographers believes it necessary to provide updated guidance for radiography education providers and clinical services managers about the entitlement of students and trainees as IR(ME)R Operators during their education and training periods and whilst undertaking practice based learning.

Under IR(ME)R Regulation (10(4)), the Employer has a responsibility to ensure that all entitled Operators are adequately trained to perform the tasks within their defined scope of practice and, similarly, Operators should not carry out a medical exposure or any practical aspect without having been adequately trained (Regulation 17(1)). The Employer must specify the scope of practice and the tasks for which an individual can act as an Operator and be able to demonstrate that he/she is adequately trained.

## Society & College of Radiographers Guidance

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Persons entitled to act as an IR(ME)R Operator must have undergone training in those subjects in Schedule 3 of IR(ME)R which are relevant to their functions and area of practice. The Society & College of Radiographers recognises that the pre-registration radiography education programmes it approves, and which are approved by the Health & Care Professions Council (HCPC) to give eligibility for registration as a Radiographer, address the requirements of Schedule 3 of IR(ME)R. Hence, these may be used as the benchmark by which the Employer defines 'adequate training' as an individual moves from being a Student Radiographer to a qualified Radiographer. For some aspects of radiographic practice the Employer will require the Radiographer to undertake some additional practical training before Operator entitlement is given e.g. local training on new equipment or modalities.

Whilst undergoing training, the requirements of Schedule 3 are unlikely to be fully met prior to graduation/qualification and in these cases Regulation 17(3) of IR(ME)R is relevant, where supervision still applies. Student Radiographers and Trainee Assistant Practitioners should be directly supervised by an HCPC registered Radiographer whilst in the clinical environment. The supervising Radiographer will be responsible for the practical aspects carried out by the student and therefore is the "Operator" for that medical exposure. It may be possible that a Student Radiographer or Trainee Assistant Practitioner completes relevant sections of Schedule 3 to deem them competent in a specific task and therefore could be entitled as an Operator within a very limited scope of practice,

If an Employer entitles a Student Radiographer or Trainee Assistant Practitioner as an "Operator", there must be a robust local entitlement process within the clinical department which satisfies the relevant sections of Schedule 3. This should clearly describes the standards required for each area of practice e.g. musculoskeletal (MSK) radiography, chest radiography, abdomen and pelvis radiography, fluoroscopy etc. SCoR would not advise entitling trainees as operators for paediatric radiography or individuals of childbearing capacity due to the higher radiation risks and the IR(ME)R requirements for particular attention to exposures for these individuals. As part of the entitlement process, the necessary information surrounding the individual's (student/trainee) scope of practice, the theoretical and practical training given as well as an assessment of competence must be clearly documented in the individual's training record in line with the IR(ME)R Employer's Procedures.

Educators should consider how any adjustments to entitlement might be reflected by the indemnity insurance they provide trainees. SoR Professional Indemnity Insurance (PII) applies to students acting under supervision. More information can be found here: [https://www.sor.org/system/files/article/201908/the\\_society\\_of\\_radiographers\\_professional\\_indemnity\\_insurance\\_for\\_student\\_clinical\\_placements\\_2019\\_0.pdf](https://www.sor.org/system/files/article/201908/the_society_of_radiographers_professional_indemnity_insurance_for_student_clinical_placements_2019_0.pdf).

Once an Employer has entitled a student or trainee as an Operator, that employer assumes responsibility for ensuring that adequate and up-to-date local training of the entitled Operator is delivered and recorded, and is consistent with the tasks the individual is entitled to carry out. It is the Employer's responsibility to maintain documented and up-to-date evidence of adequate training for all entitled IR(ME)R duty holders and this includes all Student Radiographers and Trainee Assistant Practitioners that the Employer decides to entitle as Operators.

Assistant Practitioners are normally employees and for those who have completed a College of Radiographers approved training programme successfully will have undertaken the necessary 'adequate training' to enable the Employer to entitle them as 'Operators'

However it should be noted that for both Student Radiographers and Trainee Assistant Practitioners, education providers and Clinical Services Managers are advised that the College of Radiographers believes it is inappropriate for Employers to entitle them as an "Operator" to act in their own right.

Nevertheless if an Employer is satisfied that evidence of an appropriate assessment and an up-to-date training record is held and maintained by the relevant clinical imaging or radiotherapy services departments, it is possible for a student to be entitled as an IR(ME)R Operator with a restricted scope of practice.

## **Conclusion**

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In conclusion therefore, whilst possible under legislation, the Society & College of Radiographers advises that Student Radiographers and Trainee Assistant Practitioners are not entitled as IR(ME)R Operators.

### **Maria Murray**

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