



Ag Rialáil Gairmithe Sláinte  
agus Cúraim Shóisialaigh

Regulating Health +  
Social Care Professionals

# Public Consultation Report

Radiographers Registration Board

Application for Registration Bye-Law

October 2013



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## Introduction

### About the Radiographers Registration Board

The Radiographers Registration Board has statutory responsibility for the registration of members of the profession; approval and monitoring of education and training programmes; establishing the code of professional conduct and ethics including standards of performance to which Radiographers and Radiation Therapists must adhere and recognition of qualifications gained outside the State.

### About CORU

CORU is responsible for regulating health and social care professions. It comprises the Health and Social Care Professionals Council and the registration boards established under the Health and Social Care Professionals Act 2005 (as amended). CORU's role is to protect the public by promoting high standards of professional conduct, professional education, training and competence amongst the designated professions. The designated professions under the Act are social workers, clinical biochemists, dietitians, medical scientists, occupational therapists, orthoptists, physiotherapists, podiatrists, psychologists, radiographers, social care workers and speech and language therapists.

### The Public Consultation Process

#### Background

In March 2013 CORU launched a public consultation seeking feedback on the Radiographers Registration Board **Application for Registration Bye-Law 2013**

#### Application for Registration Bye-Law 2013

In accordance with Section 37 and Section 31 of the Health and Social Care Professional Act 2005 (as amended)

37. (1) A person seeking registration as a member of a designated profession shall apply to the registration board of that profession  
(2) The application must be in the form and contain the information required by the bye-laws of the registration board concerned.
  
31. (1) (b) the registration board may make a bye-law relating to applications for registration in the register of that profession or for restoration to the register.

Therefore, the Board is empowered by the Health and Social Care Professionals Act 2005 (as amended) to make a bye-law to set out the criteria and requirements to be fulfilled by applicants when applying for registration.



## Publicising the Consultation Process

A public consultation on the draft bye-law was held between 28 March 2013 and 9 May 2013. A number of channels were used to publicise the consultation process and invite the submission of observations. These included:

- An advertisement was placed in the Irish Independent on 29 March (see appendix one).
- A press release was placed on [www.coru.ie](http://www.coru.ie) (See appendix two for a copy of the press release).
- An online feedback form was developed and the link, along with an explanation of the consultation, was emailed to all contacts in the CORU database related to Radiography and Radiation Therapy, including the Professional Bodies, Trade Unions, Educators, Hospitals, Department of Health, Department of Children and Youth Affairs, Service users, National regulatory bodies, Council and Registration Boards and other interested parties and individuals who have previously corresponded with CORU. Over 1,300 direct contacts were made.
- Information on the consultation along with a link to the online feedback form was hosted on the CORU website.

People were invited to participate in the consultation process in a number of ways:

- They could ring CORU to request a copy of the draft bye-law and to offer feedback
- They could visit CORU's office to view the draft bye-law and give their feedback in person.
- They could visit [www.coru.ie](http://www.coru.ie) and choose to complete an online feedback form, to print a copy of the form and post it, or email it to CORU.
- They could email submissions to [consultation@coru.ie](mailto:consultation@coru.ie)

## Overview of responses to consultation

There were 15 responses to the public consultation in total:

Online survey	14
Email submissions	1
Postal submissions	0
Telephone	0

## Online Feedback Form

Respondents were asked to identify if they were offering feedback on their own behalf or on behalf of an organisation.



Individual	8
Professional Organisation	7
Unknown	0

Submissions were received on behalf of the following professional organisations:

- School of Medicine & Medical Science, University College Dublin
- HSE (St Luke's, Kilkenny)
- Irish Institute of Radiography and Radiation Therapy
- Irish Cancer Society
- Discipline of Radiation Therapy, TCD
- Coombe Women and Infants University Hospital
- Health Information and Quality Authority

### Issues emerging from the consultation process

The report highlights the key issues that emerged from the consultation process which include:

1. The title of the Registration Board
2. The Radiation Therapist qualification
3. Fit and Proper/international police clearance
4. Membership of Professional body
5. Jurisdiction/International qualifications

The report presents the key findings from the consultation process followed by the decisions made in relation to the findings by the Radiographers Registration Board and a brief rationale for each decision.



## Issues emerging from the consultation process

### 1. The title of the Registration Board

Two queries were raised regarding the name of the registration board - the Radiographers Registration Board. The absence of Radiation Therapist from the registration board title was raised twice as an issue.

#### Decision

The Radiographers Registration Board noted that currently the Health and Social Care Professionals Act 2005, (as amended) (the Act) specifies the professional title "Radiographer". The name of the registration board is as set out in the Act.

### 2. Fit and proper/International Police clearance

A query was raised regarding obtaining police clearance from overseas, and if an applicant who has returned more than 10 years from being abroad, is required to submit a certificate of police clearance from that country.

#### Decision

The Radiographers Registration Board requirement is that if an applicant has lived outside of Ireland for more than 6 months since the age of 18, they must provide police clearance from that country, as evidence towards the Fit and Proper requirements set down by the Board.

### 3. Membership of a Professional Body

Two respondents raised the issue of membership of a Professional Body. One queried whether it was fair to seek evidence of membership of a professional body when there is no obligation on members of the profession to hold such membership. The second respondent questioned having to pay membership of a professional body in order to obtain registration.

#### Decision

The Radiographers Registration Board confirms that the Health and Social Care Professionals Act 2005, (as amended) sets out five requirements which applicants must meet when applying for registration. One of the requirements is that the



applicant “satisfies the Board that he or she is a “Fit and Proper” person to engage in the practice of the profession. Applicants are, therefore, asked to provide details of any memberships of professional/regulatory bodies (where applicable). If an applicant is a member of a professional/regulatory body, this can assist in confirming that there are no fit and proper issues. It is not a requirement that an applicant should hold membership of any professional or other regulatory body in order for an application to be considered by the Registration Board.

#### **4. Jurisdiction/International Qualifications**

A respondent queried why only Irish Qualifications are approved by the Board and suggested that UK and Northern Ireland Qualifications should also be included.

#### **Decision**

The Radiographers Registration Board may only approve qualifications in the Republic of Ireland. The EU Directive 2005/36/EU on the recognition of professional qualifications requires that the Competent Authority (Radiographers Registration Board) considers qualifications gained outside the State for recognition on a case by case basis within the regulations set out in the Directive. There is no provision in the regulations for individual agreements regarding recognition of qualifications between Competent Authorities in different jurisdictions.

#### **Conclusion**

The Radiographers Registration Board considered all submissions in detail. The Board determined that it was not necessary to make any amendments to the draft Bye-Law following the consultation.

#### **Acknowledgements**

CORU would like to extend our appreciation and thanks to all those that participated in the consultation process.



## Appendix 1: Press release

### **Radiographers Registration Board Launches Public Consultation on Bye-Laws**

**Thursday 28 March 2013:** The Radiographers Registration Board, which has statutory responsibility for the registration of radiographers and radiation therapists, has today launched a [public consultation process on three bye-laws that will guide the future regulation of the profession.](#)

The three bye-laws upon which views are sought relate to:

- Code of Professional Conduct and Ethics
- Application for Registration
- Approved Qualifications and Divisions of the Register

These bye-laws will form the foundation pillars upon which the framework for the regulation of radiographers and radiation therapists will be developed.

Launching the public consultations, Ms Ginny Hanrahan, Registrar, commented that: “It is critical that members of the profession participate in these consultations so they can help shape the new regulatory environment for their profession.”

Ms. Hanrahan continued: “Regulation is ultimately about protecting patients and therefore we are also very interested to hear the views of the public more generally”.

Each of the bye-laws can be viewed on [www.coru.ie](http://www.coru.ie) or can be requested by emailing [consultation@coru.ie](mailto:consultation@coru.ie) or contacting CORU on 01 2933160.

Feedback can be provided by filling in feedback forms on [www.coru.ie](http://www.coru.ie) by emailing [consultation@coru.ie](mailto:consultation@coru.ie), or in writing to Public Consultation, CORU, 13 - 15 The Mall, Beacon Court, Bracken Rd., Sandyford, Dublin 18.

The consultation process will close at 12 noon on Thursday 9 May 2013 Any submissions received after this time will not be considered.

ENDS





## Appendix 2: Copy of Advertisement

Irish Independent 29 March 2013

A public consultation advertisement for CORU. The header includes the CORU logo and the text 'Ag Rialáil Gairníthe Sláinte agus Cúraim Shóisialaigh' and 'Regulating Health Social Care Professionals'. The main title is 'Public Consultation'. The text states: 'The Radiographers Registration Board wants to hear the views of the public, the profession and other interested parties on:'. It lists three items: 1. Application for Registration Bye-Law 2013, 2. Code of Professional Conduct and Ethics Bye-Law 2013, and 3. Approved Qualifications and Divisions of the Register Bye-Law 2013. It further states: 'Further information on the consultation can be found on www.coru.ie'. A bolded closing date is given: 'The closing date for receipt of comments and submissions is 12 noon on Thursday May 9 2013.' A final note says: 'Submissions received after this time and date will not be considered.' The advertisement has a blue and grey gradient background at the bottom.

**CORU** Ag Rialáil Gairníthe Sláinte agus Cúraim Shóisialaigh  
Regulating Health Social Care Professionals

## Public Consultation

The Radiographers Registration Board wants to hear the views of the public, the profession and other interested parties on:

1. Application for Registration Bye-Law 2013
2. Code of Professional Conduct and Ethics Bye-Law 2013
3. Approved Qualifications and Divisions of the Register Bye-Law 2013

Further information on the consultation can be found on [www.coru.ie](http://www.coru.ie)

**The closing date for receipt of comments and submissions is 12 noon on Thursday May 9 2013.**

Submissions received after this time and date will not be considered.



### Appendix 3: Copy of Online Feedback Form

#### **Radiographers Registration Board: Public Consultation on Bye-Law on Application for Registration**

Thank you for taking the time to participate in CORU's consultation process on a bye-law on Application for Registration for Radiographers and Radiation Therapists. This feedback form will take approximately ten minutes to complete.

We are currently developing a system of statutory registration for health and social care professionals. The purpose of this regulation is to protect the public.

If you have any queries about the consultation process or completing the survey, please contact CORU on 01 2933160 or email [consultation@coru.ie](mailto:consultation@coru.ie).

The closing date for receipt of submissions is 12:00pm on 09/05/2013. Any submissions received after that time will not be considered.

We want to hear the views of the public and the profession and by participating in this consultation process you are helping to shape how radiographers and radiation therapists are regulated.

Yours faithfully,  
Ginny Hanrahan  
Registrar

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**Contact Details:**

You do not need to provide this information but please do if you would like us to provide you with details on the outcome of this consultation process.

First Name: \_\_\_\_\_

Surname: \_\_\_\_\_

Email: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Would you like to be added to our database so we can contact you regarding future developments? Please say YES or NO

\_\_\_\_\_

**Are you contributing to this survey in  
(please tick one)**

a personal capacity? \_\_\_\_\_

on behalf of an organisation? \_\_\_\_\_

If on behalf of an organisation, please specify  
the name of the organisation): \_\_\_\_\_

**How did you hear about this consultation?  
(please tick as many as apply)**

Advertisement in a newspaper \_\_\_\_\_

Article in a publication \_\_\_\_\_

On [www.coru.ie](http://www.coru.ie) \_\_\_\_\_

On another website \_\_\_\_\_

By email \_\_\_\_\_

Other (please specify) \_\_\_\_\_



**Question 1:**

Please provide any comments you have on the draft Bye-Law on the Application for Registration of Radiographers and Radiation Therapists?

**Question 2:**

Is there anything you believe should be added to this bye-law?

**Question 3**

Is there anything you believe should be removed from this bye-law?

Thank you for participating in this consultation process. Your views will be taken into consideration. If you have provided your contact details you will be contacted with details on the outcome of this process.

If you have any queries please contact CORU on 01 2933160 or email [consultation@coru.ie](mailto:consultation@coru.ie)



## Appendix 4: Copy of Draft Bye-law

S.I. No.            of 2013

### **RADIOGRAPHERS REGISTRATION BOARD APPLICATION FOR REGISTRATION BYE-LAW 2013**

The Radiographers Registration Board, in exercise of the powers conferred on it by section 31 of the Health and Social Care Professionals Act 2005 (as amended), with the approval of the Health and Social Care Professionals Council, hereby makes the following bye-law:

1.     (1)     This bye-law may be cited as the Radiographers Registration Board Application for Registration Bye-law 2013.  
  
       (2)     This bye-law comes into operation on [date].
  
2.     In this bye-law –  
  
       “the Act” means the Health and Social Care Professionals Act 2005 (No. 27 of 2005) as amended from time to time;  
  
       “the Board” means the Radiographers Registration Board.
  
3.     The Board has determined that a person seeking registration shall apply to the Board by making an application in the form and containing the information set out in this bye-law, or as otherwise determined by the Board from time to time.
  
4.     An application for registration in the register shall:
  - (1)     be made in writing or by electronic means on such form as is provided from time to time by or on behalf of the Board;



- (2) contain the following information:
  - a. the register or division(s) of the register to which the application relates;
  - b. details and evidence of the applicant's personal and contact information;
  - c. details and evidence of the applicant's qualification(s) in reliance upon which the application is made;
  - d. details and evidence sufficient to satisfy the Board of the applicant's:
    - (i) career and employment history;
    - (ii) proof of practice in their profession (where applicable);
    - (iii) membership of professional/ regulatory bodies (where applicable); and
    - (iv) professional business operations (where applicable);
  - e. details of health and character in a format satisfactory to the Board, for the purposes of assisting the Board's consideration of the applicant as a fit and proper person to engage in the practice of the profession; and
  - f. any other information that the Board may deem necessary for the purpose of Section 37 of the Act;
- (3) be completed, signed and dated by the applicant;
- (4) be accompanied by:



- a. the following proof and verification of identity:
  - (i) two recent colour passport-sized photographs of the applicant,
  - (ii) a certified copy of the applicant's valid passport or such suitable alternative proof of identity as the Board may from time to time determine,
  - (iii) details of the applicant's personal public service number (PPSN); and
  - (iv) such other proof or verification of identity that the Board may deem necessary;
- b. the application fee prescribed by Council under Section 18 of the Act;
- c. a completed statutory declaration ;
- d. a fully completed and signed Garda Vetting form permitting An Garda Síochána to furnish the Board with either a statement that there are no convictions registered against the applicant or a statement of all convictions and/or prosecutions, successful or not, pending or completed, in the State or elsewhere as the case may be; and
- e. in the case of applicants who have lived outside of the State for such periods of time as the Board may specify, a certified copy of police clearance from the jurisdictions of previous residence (or such jurisdictions as the Board may deem appropriate) and/



or such other information as the Board may from time to time determine in respect of such periods; and

- (5) be sent or delivered to the Registrar of the Board.
5. An applicant shall comply with such requirements of the Board in respect of education, training and continuing professional development as may apply from time to time.
6. An applicant who wishes to resume the practice of the profession after not having practised the profession for such period as the Board may specify shall comply with such criteria or conditions as the Board may specify from time to time for the purposes of section 31(1)(fa) of the Act.

GIVEN under the seal of the Radiographers Registration Board  
[Date]

Chairperson, Radiographers Registration Board

and

Member, Radiographers Registration Board





## EXPLANATORY NOTE

*(This note is not part of the bye-law and does not purport to be a legal interpretation).*

This bye-law details the form and information to be contained an application to the Radiographers Registration Board for registration.