



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Public Consultation Report

Radiographers Registration Board
Approved Qualifications and Divisions of the Register
Bye-Law 2013

October 2013

An Chomhairle um Ghairmithe Sláinte agus Cúraim Shóisialaigh
Health and Social Care Professionals Council



Contents

About the Radiographers Registration Board	2
The Public Consultation Process	2
Publicising the Consultation Process	3
Issues emerging from the consultation process	5
Conclusion	6
Acknowledgements.....	6



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 Approved Qualifications and Division of the Register Bye-Law 2013

Approved Qualifications and Divisions of the Register Bye-Law 2013

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

31. (1) (c) the registration board may make a bye-law relating to the qualifications approved for the purposes of Section 38 (2) (a) as attesting to the standard of proficiency required for registration; and



Therefore the Registration Board is empowered by the Health and Social Care Professionals Act 2005 (as amended) to make a bye-law to set out the approved qualifications which attest to the standards of proficiency required for registration; and

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

31. (1) (f) the registration board may make a bye-law relating to the conditions for registration in a division of the register of that profession, but only if division of the register is authorised by any rules or guidelines issued by the Council.

Therefore (having received guidelines from Council in May 2012), the Board is empowered by Section 32 of the Health and Social Care Professionals Act 2005 (as amended) to make a bye-law to set out the conditions for registration in a division of the register.

32. (2) if authorised by any rules made or guidelines issued by the Council, a register may be divided into the divisions specified in those rules or guidelines for different categories of registrants.

Publicising the Consultation Process

A public consultation on the draft bye-law was held between March 28 and May 9 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 Friday 29 March (see appendix one).
- A press release was placed on 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, DoH contacts, DoCYA contacts, 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 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

Overview of responses to consultation

There were 7 responses to the public consultation:

Online survey	7
Email submissions	0
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	5
Professional Organisation	2
Unknown	0

Submissions were received on behalf of the following professional organisations:

- School of Medicine & Medical Science, University College Cork
- HSE (St. Luke's, Kilkenny)



Issues emerging from the consultation process

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

1. Issues regarding the Title
2. Grandparenting and International Qualifications
3. Qualifications/dual 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. Issues regarding the Title

Three respondents raised the issue of the Radiation Therapist Title. Two queried why it was not included in the name of the registration board. A query was raised as to why the title “Therapeutic Radiographer” was not being used.

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. Grandparenting and International Qualifications

A respondent stated that a person working in Radiography/Radiation Therapy, who holds an international qualification which has not been validated / recognised, should not be permitted to register under grandparenting.

A respondent queried the correct title for the Radiation Therapy Qualification.

A respondent asked how a dual-qualified Radiographer/Radiation Therapist will fulfill the requirements for registration in both professions.

Decision

The Radiographers Registration Board confirmed that there is no automatic entitlement to registration. All applications must meet the requirements laid down in legislation.



Normally, all holders of International qualifications which have not been previously validated or recognised must first apply to have their qualification recognised before they can apply for registration.

However, during the grandparenting period, holders of international qualifications who have been practising in the country for two of the five years prior to the opening of the register, may apply for registration through Section 91 (1) (c) (i) (II) “a qualification that, in the opinion of the board, is sufficiently relevant to that profession and is of a standard not lower than a qualification listed opposite the profession in the third column of that Schedule” If the board decides that the qualification is not sufficiently relevant then it may require the applicant to undergo an Assessment of Professional Competence and pay the fee (€500).

The Radiographers Registration Board has confirmed the title of the Qualification with the Education Institution as: The Bachelor in Science in Radiation Therapy (B. Sc (Ther.Rad)) from the University of Dublin.

The Radiographers Registration Board confirmed that applicants may apply to register in both divisions of the register. However, they must meet the requirements set out in the Bye-Law for each division separately.

In the case of an applicant applying under Section 91, they must have been practising in the profession of the division for two out of the five years prior to the opening of the register.

Conclusion

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

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 or can be requested by emailing consultation@coru.ie or contacting CORU on 01 2933160.

Feedback can be provided by filling in feedback forms on www.coru.ie by emailing 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 that the Radiographers Registration Board wants to hear the views of the public, the profession and other interested parties on three specific by-laws. It provides the website www.coru.ie for further information and sets a closing date of 12 noon on Thursday May 9 2013. A note at the bottom states that submissions received after this time and date will not be considered.

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

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

Public Consultation on Draft Bye-Law on Approved Qualifications and Divisions of the Register

Thank you for taking the time to participate in CORU's consultation process on the Radiographers Registration Board Approved Qualifications and Division of the Register Bye-Law. This feedback form will take approximately ten minutes to complete.

We are currently developing a system of statutory registration of radiographers and radiation therapists. 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.

The closing date for receipt of submissions is 12:00pm on Thursday, 9 May 2013. Any submissions received after that date 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



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 _____

On another website _____

By email _____

Other (please specify) _____



Question 1:

Please provide any comments you have on the Radiographers Registration Board
Draft Bye-Law on Approved Qualifications and Divisions of the Register

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



Appendix 4: Copy of Draft Bye-law

S.I. No. of 2013

RADIOGRAPHERS REGISTRATION BOARD APPROVED QUALIFICATIONS AND DIVISIONS OF THE REGISTER 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 Approved Qualifications and Divisions of the Register 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;

 “corresponding qualification” has the same meaning as in section 90 of the Act;

 “professional qualification” has the same meaning as in section 3(1) of the Act;

 “qualification” has the same meaning as in section 3(1) of the Act; and

 “the Register” means the register of the Radiographers Registration Board to be established under section 36(1)(a).

3. (1) The Radiographers Registration Board, as authorised by guidelines issued by the Health and Social Care Professionals Council under



Section 31(7) of the Act, hereby establishes the Register pursuant to Section 36(1) of the Act and divides it into two divisions pursuant to Section 36(2) of the Act.

(2) The divisions will be known as follows:

1. the Radiographers Division
2. the Radiation Therapists Division

4. The Radiographers Registration Board, for the purposes of Section 38(2)(a) of the Act, hereby approves the following qualification as attesting to the standard of proficiency required for registration in the Radiographers Division of the Register:

Bachelor of Science (Hons) (Radiography) from the National University of Ireland

5. The Radiographers Registration Board, for the purposes of Section 38(2)(a) of the Act, hereby approves the following qualification as attesting to the standard of proficiency required for registration in the Radiation Therapists Division of the Register:

Bachelor of Science (Hons) (Therapeutic Radiography) from the University of Dublin

Radiographers Division of the Register

6. (1) Subject to an applicant meeting the other requirements for registration in section 38(1) of the Act, the Radiographers Registration Board shall grant registration in the Radiographers Division of the Register to any person who:

- a) has been awarded the Bachelor of Science (Hons) (Radiography) from the National University of Ireland, or



- b) is a person to whom Directive 2005/36/EC applies and whose professional qualification in radiography is recognised in the State in accordance with that Directive, or
- c) is a person other than a person referred to in paragraph (a) or (b), who is eligible to practise that profession in a state other than a state in relation to which Directive 2005/36/EC applies and who—
 - (i) holds a professional qualification in radiography that the Radiographers Registration Board decides is one that attests to a standard of proficiency corresponding to the standard attested to by the Bachelor of Science (Hons) (Radiography) from the National University of Ireland, or
 - (ii) holds a professional qualification that is one that the Radiographers Registration Board decides is not a professional qualification that attests to such a standard of proficiency, but is the subject of a decision of the Radiographers Registration Board that he or she successfully completed, in the State, the aptitude test or adaptation period that the Radiographers Registration Board has required of the person.

(2) Subject to an applicant meeting the other requirements for registration in section 91(1) of the Act, the Radiographers Registration Board shall grant registration in the Radiographers Division of the Register to any person who, during the period of 5 years ending on the date of the establishment of the Register, was engaged in the State in the practice of radiography, within the meaning, where the Radiographers Registration Board has specified such a meaning in bye-laws, of those bye-laws, for a period (or periods which, when taken together, amount to such period) of not less than 2 years or such other period as may be specified in those bye-laws and whose application for registration is received by the Radiographers Registration Board between the date of establishment of the Register and 2 years after that date and who:



- a) holds the Bachelor of Science (Radiography) from the National University of Ireland, or
- b) holds the Diploma of the College of Radiographers, London, or
- c) holds a corresponding qualification, or
- d) holds a professional qualification that, in the opinion of the Radiographers Registration Board, is sufficiently relevant to the profession of radiographer and attests to a standard of proficiency corresponding to the qualifications referred to at a) or b) above, or
- e) successfully completes an assessment of professional competence set by the Radiographers Registration Board in accordance with any guidelines issued by the Council.

Radiation Therapists Division of the Register

7. (1) Subject to an applicant meeting the other requirements for registration in section 38(1) of the Act, the Radiographers Registration Board shall grant registration in the Radiation Therapists Division of the Register to any person who:
- a) has been awarded the Bachelor of Science (Hons) (Therapeutic Radiography) from the University of Dublin or
 - b) is a person to whom Directive 2005/36/EC applies and whose professional qualification in that profession is recognised in the State in accordance with that Directive, or
 - d) is a person other than a person referred to in paragraph (a) or (b), who is eligible to practise radiation therapy in a state other than a state in relation to which Directive 2005/36/EC applies and who—



(i) holds a professional qualification in radiation therapy that the Radiographers Registration Board concerned decides is one that attests to a standard of proficiency corresponding to the standard attested to by Bachelor of Science (Hons) (Therapeutic Radiography) from the University of Dublin, or

(ii) holds a professional qualification that is one that the Radiographers Registration Board decides is not a professional qualification that attests to such a standard of proficiency, but is the subject of a decision of the Radiographers Registration Board that he or she successfully completed, in the State, the aptitude test or adaptation period that the registration board has required of the person.

(2) Subject to an applicant meeting the other requirements for registration in section 91(1) of the Act, the Radiographers Registration Board shall grant registration in the Radiation Therapists Division of the Register to any person who, during the period of 5 years ending on the date of the establishment of the Register, was engaged in the State in the practice of radiation therapy, within the meaning, where the Radiographers Registration Board has specified such a meaning in bye-laws, of those bye-laws, for a period (or periods which, when taken together, amount to such period) of not less than 2 years or such other period as may be specified in those bye-laws and whose application for registration is received by the Radiographers Registration Board between the date of establishment of the Register and 2 years after that date and who:

- a) holds the Bachelor of Science (Therapeutic Radiography) from the University of Dublin, or
- b) holds the Diploma of the College of Radiographers, London or
- c) holds a corresponding qualification, or



- d) holds a qualification that, in the opinion of the Radiographers Registration Board, is sufficiently relevant to the profession of radiation therapist and attests to a standard of proficiency corresponding to the qualifications referred to at a) or b) above, or
 - e) successfully completes an assessment of professional competence set by the Radiographers Registration Board in accordance with any guidelines issued by the Council.
8. The registration requirements of the Radiographers Registration Board set out above are in addition to any other requirements of the Board arising from sections 37, 38 and 91 of the Act.
9. Subject to the requirements identified above, persons may apply for and be granted registration in both divisions of the Register.

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 instrument and does not purport to be a legal interpretation.)

This bye-law identifies the qualifications awarded in the State which are approved by the Radiographers Registration Board as attesting to the standard of proficiency required for registration with the Radiographers Registration Board and creates two divisions of the Radiographers Registration Board's register. The divisions are as follows:

- a) Radiographers Division
- b) Radiation Therapists Division

This bye-law identifies the conditions for registration in each division in the Register established by the Radiographers Registration Board.