



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Regulatory Impact Assessment Report

Establishment of Divisions of the Physiotherapists Register to facilitate the introduction of Physiotherapist Referrers for Radiological Diagnostic Procedures

December 2025

[1] Summary of Regulatory Impact Assessment

Organisation	CORU – Health and Social Care Professionals Council
Registration Board	Physiotherapists Registration Board
Regulatory Intervention	<p>The establishment of a division of the Physiotherapists Register to facilitate the registration of already registered practitioners who, following completion of an approved education and training programme, will have demonstrated the threshold competencies for practice as a referrer for radiological diagnostic procedures.</p> <p>The establishment of a division of the Physiotherapists Register requires:</p> <ul style="list-style-type: none"> • Articulation of the education and training standards for entry to the division; • Enactment of a revised Approved Qualifications Bye-Law; • Enactment of a revised Physiotherapists Registration Board Application for Registration Bye-Law; and • Enactment of a Physiotherapists Registration Board Conditions for Registration in the referral for Radiological Diagnostic Procedure Division Bye-Law
Relevant Legislation	Health and Social Care Professionals Act 2005 (as amended)
Date of Assessment	December 2025
Stage	Post-Public Stakeholder Consultation
Associated Documentation	<p>Copies of the following documentation are available online:</p> <p>[1] Consultation</p> <ul style="list-style-type: none"> • Education and Training Standards • Approved Qualifications Bye-Law • Registration Bye-Laws <p>[2] Approved Education and Training Standards</p> <ul style="list-style-type: none"> • Standards of Competence • Requirements for Education Providers <p>[3] Approved Bye-Laws</p> <ul style="list-style-type: none"> • Physiotherapists Registration Board Approved Qualifications Bye-Law • Physiotherapists Registration Board Conditions for Registration in the referral for Radiological Diagnostic Procedure Division Bye-Law

	<ul style="list-style-type: none"> • Physiotherapists Registration Board Application for Registration Bye-Law
Contact	Strategy and Policy Unit: strategyandpolicy@coru.ie

[2] Statement of Regulatory Intervention Context and Objectives

In July 2023, the then Minister for Health, Stephen Donnelly, announced a policy decision to enable physiotherapists to refer for radiological diagnostic procedures, including procedures that would involve exposure to ionising radiation, such as x-ray.

There are extensive legislative requirements concerning the exposure to ionising radiation for the safety and protection of service users, practitioners and the public more generally, most notably: Statutory Instrument 30/2019: Radiological Protection Act 1991 (Ionising Radiation) Regulations 2019 and Statutory Instrument 256/2018: Basic Safety Standards for Protection Against Dangers Arising from Medical Exposure to Ionising Radiation.

The Physiotherapists Registration Board was requested to provide advice to the Department of Health on the regulatory requirements that would enable physiotherapists to refer for radiological diagnostic procedures. Recognising the need to ensure public protection, the Registration Board concluded that designation of appropriately trained physiotherapists to act as referrers for radiological diagnostic procedures requires regulatory oversight to set the standard of competence for the practice of referring.

The aim of the Regulatory Impact Assessment undertaken by the Physiotherapists Registration Board is to assess what options are available to it in order to facilitate the introduction of physiotherapist referrers for radiological diagnostic procedures and, having identified a regulatory approach, determine the impact of implementation.

[3] Initial Scoping by the Physiotherapists Registration Board

In light of the decision made by the then Minister for Health, the Board undertook a detailed scoping and review exercise of its education and training requirements in an effort to distinguish between the threshold requirements for general physiotherapy practice and the threshold requirements for physiotherapy referrals.

The Board examined the extensive and detailed legislative requirements concerning exposure to ionising radiation are in operation for the safety and protection of service users, practitioners, and the public. The European Council Directive 2013/59/Euratom Basic Safety Standards (BSS) establishes the basic safety standards for protection against the dangers of exposure to medical ionising radiation. These requirements were transposed into Irish Law by two separate statutory instruments:

- **Statutory Instrument 30/2019:** Radiological Protection Act 1991 (Ionising Radiation) Regulations 2019, which details requirements around protections for workers and the public, establishing responsibility with the Environmental Protection Agency (EPA) and the Office of Radiation Protection and Environmental Monitoring (ORM); and
- **Statutory Instrument 256/2018:** Basic Safety Standards for Protection Against Dangers Arising from Medical Exposure to Ionising Radiation details patient protection

requirements and assigns responsibility to the Health Information and Quality Authority (HIQA).

The Board, with input from the Department of Health's Expert Advisory Group for Physiotherapist Referral, reviewed the only existing comparable and available national or international standards for referrer that were published by the Nursing and Midwifery Board of Ireland (NMBI) *Nurse Authority to Refer for Radiological Procedures: Standards and Requirements for Education Programmes*. In addition, reflecting that practice of radiological referral would be extended to existing practitioners (i.e. physiotherapists who are registered on the Physiotherapists Register), the Board assessed the NMBI *Standards and Requirements* against its existing *Standards of Proficiency* – the knowledge, skills and professional behaviours required for entry into practice – and its *Code of Professional Conduct and Ethics for Physiotherapists*, which all registrants must adhere to.

The Board determined that the knowledge, skills and professional behaviours required of physiotherapists to act as referrers for radiological diagnostic procedures were not part of the threshold standards for entry into general physiotherapy practice.

As such, it was concluded that a specific and bespoke regulatory intervention would be required to facilitate the introduction of physiotherapist referrers for radiological diagnostic procedures in Ireland.

Under the current provisions of the *Health and Social Care Professionals Act 2005 (as amended)*, a Registration Board has no legislative remit to annotate a register of practitioners in order to identify a specialisation in an area of practice or completion of additional post-qualifying education and training. In addition, it is outside the remit of a Board to approve post-qualifying education and training programmes for practitioners registered on a general register.

In light of these legislative parameters, the Physiotherapists Registration Board, recognising the public protection need to establish regulatory oversight of the practice of physiotherapist referral for radiological diagnostic procedures, along with the assessment that such practice required knowledge and skills that were beyond the threshold for entry into general practice as a physiotherapist as set in the *Standards of Proficiency for Physiotherapists*, made the decision to establish – following approval from the Health and Social Care Professionals Council – a division of the Physiotherapists Register for referral for radiological diagnostic procedures. It made this determination having explored three possible options, as identified below.

[4] Identification of Options: Analysis of Risks, Benefits and Impacts

On the basis of the initial scoping by the Physiotherapists Registration Board **three** potential regulatory pathways were identified and examined by the Board:

1. Reliance on *Code of Professional Conduct and Ethics*
2. Await amendments to the legislation to allow for annotation of the register
3. Establish a division of its register to facilitate the introduction of physiotherapist referrers for radiological diagnostic procedures

Option One: Rely on the provisions of the *Physiotherapists Registration Board Code of Professional Conduct and Ethics*

This option would require the Physiotherapists Registration Board to make no changes to its current regulatory approach and structure and rely on the provisions of its Code of Professional Conduct and Ethics – specifically, provisions around obeying laws, regulations and guidelines (Section 7), acting within the limits of your knowledge, skills, competence and experience (Section 9) and acting in the best interests of service users (Section 1) – in order to facilitate the introduction of physiotherapist referrers for radiological diagnostic procedures.

<p style="text-align: center;">Risks</p>	<p>While the <i>Code</i> requires practitioners to always act within their knowledge, skills and competencies, reliance on it would be as a tool following an identified and reported instance of Fitness to Practise – i.e. after a complaint has been received around exposure to ionising radiation following referral. There are concerns, therefore, around the potential public health implications whereby a risk has been identified but the regulatory oversight does not fully mitigate the risk itself.</p> <p>Additionally, this option does not provide for the articulation of the threshold knowledge and skills required to undertake referral for radiological diagnostic procedures or the assessment of training programmes. Given the significant high risk identified around exposure to ionising radiation, there is a further risk with this option that there would not be a consistent level of education and training – and, thereby not a consistent level of proficiency for safe practice – that would have a potentially negative impact on public protection.</p>
<p style="text-align: center;">Benefits</p>	<p>Reliance on the <i>Code</i> would not require any changes to the current regulatory model, thereby – from a regulatory perspective – facilitating the seamless introduction of physiotherapist referrers for radiological diagnostic procedures.</p>
<p style="text-align: center;">Impacts</p>	<p>The reliance the <i>Code</i> for regulatory oversight, it was considered, would not address the potential public health risks identified and evidenced by its restricted practice established in legislation around managing the exposure of the public to ionising radiation.</p> <p>Further still, the Board concluded that the level of potential risk presented by exposure to ionising radiation was disproportionately mitigated by the use of a regulatory tool that addressed concerns post-exposure. This conclusion</p>

	<p>was considered in the context of the Board’s statutory object to ensure public protection.</p> <p>The Board concluded that this option would not provide a sufficient level of public protection in light of the risks identified.</p>
--	---

Option Two: Await proposed amendments to the *Health and Social Care Professionals Act (2005) as amended to allow for annotation of a Register*

This option would require the Physiotherapists Registration Board to wait for proposed amendments to the Health and Social Care Professionals Act 2005 (as amended) that seeks to introduce the provision for a Registration Board to place an annotation for individuals on its register who have completed additional education and training in a specialised area of post-registration practice.

Risks	<p>This option requires the passage of legislation through both House of the Oireachtas, and its associated committees, before enactment in order to operationalise its provisions. Currently, legislative amendments to the <i>Health and Social Care Professionals Act 2005 (as amended)</i> are being drafted to be presented by the Minister for Health into the Oireachtas. It should be noted that any amendments to primary legislation will be subject to proportionality assessment.</p> <p>Previous experience has confirmed that the legislative process is a detailed and lengthy one that can take multiple years to complete.</p> <p>As such, this option could require the Board to wait multiple years before being in a position to have regulatory oversight of physiotherapist referrers for radiological diagnostic procedures. This would significantly delay the introduction of the Minister’s policy into the Irish health service.</p> <p>The length of time preceding implementation could be further extended by the policy, guidance and administrative requirements of establishing a completely new regulatory function. As this would be the first time that a profession would have the opportunity to annotate its register, sufficient time would need to be provided in order to operationalise the new regulatory function of assessing post-registration education and training programmes for the purposes of annotation.</p>
--------------	---

	<p>Furthermore, there is also a risk that, while introduced as part of amendments to the current principal legislation, throughout the debating and deliberation process, any proposed amendments could be altered and changed. Therefore, there is a risk that the provision around the annotation of the register could be altered during the legislative process and the passage of the amendments may not, then, provide the mechanism that would facilitate the introduction of physiotherapist referrers.</p>
<p>Benefits</p>	<p>This approach would offer a more robust level of regulatory oversight and assurance of public protection than the first option.</p> <p>It would also offer the clearest identification for members of the public as to which physiotherapists were able to refer for radiological diagnostic procedures and which were not.</p>
<p>Impacts</p>	<p>Following passage of the legislative amendments, this approach would require a range of steps and additional regulatory activity in order to implement:</p> <ul style="list-style-type: none"> • Establishment of policy and processes around annotation of registers • Setting of post-registration education and training requirements for physiotherapist referral for radiological diagnostic procedures • Approval of relevant education and training programme(s) • Amendments to relevant registration bye-laws • Consideration of impact on Approved Qualifications Bye-Law <p>While all of these measures would provide for the necessary regulatory oversight, the Board was concerned around the timelines for implementation and its impact on public protection and service delivery. In particular, two scenarios were identified:</p> <ul style="list-style-type: none"> • Waiting on the passage of legislative amendments would lead to a delay on the introduction of the Minister’s policy decision with its associated impact on time-bound allocation of resources and wider, ongoing impact on the service delivery model and the impact of this on public protection • The potential progression of the Minister’s decision and reliance on the <i>Code</i> as a regulatory measure in the interim until the passage of the legislative amendments.

	Given the potential impacts of this approach, the Board concluded that this option would not provide a sufficient level of public protection.
--	---

Option Three: Establish divisions of the Physiotherapists Register to allow for a Division for Referrers for Radiological Diagnostic Procedures

This option would require the Physiotherapists Registration Board to use existing provisions within the Health and Social Care Professionals Act 2005 (as amended) to establish divisions of its register, to include a general division of which all practitioners must be registered on and a second division, specifically for practitioners who have completed additional education and training in the practice of referral for radiological diagnostic procedures.

Risks	The division of the existing, well-established and recognised Physiotherapists Register could potentially cause confusion within the profession and, more particularly, for members of the public in being able to identify who has the regulatory right to refer for radiological diagnostic procedures.
Benefits	<p>The division of the register provides for the most timely introduction of a regulatory schema that offers robust oversight of the practice of physiotherapist referral for radiological diagnostic procedures which, by extension, offers assurances of public protection.</p> <p>Using existing legislation, the establishment of a separate division utilises regulatory processes that are well understood and established for this profession.</p> <p>In addition, this approach – while certainly having some potential to confuse individuals (something that can be mitigated through public communication campaigns) – also ensures that there is a clear, identifiable list of physiotherapists with this additional training that practitioners and members of the public can access and review.</p>
Impacts	<p>Much like the previous option, this approach would require a range of steps and additional regulatory activity in order to implement:</p> <ul style="list-style-type: none"> • Setting of post-registration education and training requirements for physiotherapist referral for radiological diagnostic procedures • Approval of relevant education and training programme(s)

	<ul style="list-style-type: none"> • Amendments to relevant registration bye-laws, including a specific bye-law around the conditions for registration on the referrers division • Amendment to the Approved Qualifications Bye-Law
--	---

Having evaluated range of options available to it, the Board concluded that the most robust regulatory option that facilitated the more timely introduction of physiotherapist referrers for radiological diagnostic procedures and whose risks could be most manageably mitigated was Option Three.

The following section of this assessment explores the impacts of this regulatory intervention more completely.

[5] Exploring the Impact of the Regulatory Intervention Selected

Section 36(2) of the *Health and Social Care Professionals Act 2005 (as amended)* provides for a Registration Board to establish divisions to its register, subject to guidelines issued by the Council in line with Section 31(7) of the Act. In order to facilitate the introduction of physiotherapist referrers for radiological diagnostic procedures as an area of specific professional practice for registered practitioners, the Physiotherapists Registration Board made the decision to divide its register into two divisions:

- a **general division** in which all registrants must be registered in order to use the title ‘physiotherapist’ or ‘physical therapist’; and
- a **referral for radiological diagnostic procedures division**, for those physiotherapists who meet the regulatory requirements to deliver this service.

Please Note

The establishment of divisions of the Physiotherapists Register does **not** change or impact the regulatory structures underpinning entry into physiotherapy practice in Ireland. The regulatory requirements for entry into practice as a physiotherapist in Ireland will remain the same. All individuals seeking to register as a physiotherapist and use the protected titles of ‘physiotherapist’ or ‘physical therapist’ must meet the same threshold standards for entry into practice as when the Board had a single register without divisions.

The regulatory intervention is specific to those already CORU registered physiotherapists who wish to develop their scope of practice to include referral for radiological diagnostic procedures; an area of practice that is beyond threshold entry into physiotherapy practice in Ireland.

[a] Setting threshold Regulatory Requirements for Entry to the Divisions of the Register

Under the provisions set out in the *Health and Social Care Professionals Act 2005 (as amended)*, each Registration Board operates a qualifications-based register whereby applicants to a register or a division of a register, as detailed in Section 38(1)(c) of the legislation, are granted registration on the basis of holding an approved qualification for entry to either the register or division of the register. Each Registration Board establishes a list of approved qualifications that sit on an Approved Qualifications Bye-Law. Applicants presenting

with a qualification on this bye-law are eligible – subject to meeting all other fit and proper requirements – for registration. Where a Board has divisions of its register, this Approved Qualifications Bye-Law must list the qualification(s) specific to entry for each of the divisions of the register.

Qualifications are listed on an Approved Qualifications Bye-Law following the approval of an education and training programme by the Registration Board. Programmes that are approved by a Board are subject to monitoring – at least once every five years – to ensure their continued suitability as an entry to the register or division of the register.

Section 48(2) of the *Health and Social Care Professionals Act 2005 (as amended)* states that for the purposes of identifying the threshold standard for entry to the register or division of the register, the Registration Board, “[...] may issue guidelines concerning the requirements for its approval of education and training programmes.” These guidelines comprise two types of requirements set by the Board:

- *Knowledge and Skills*, set at the threshold or minimum level, that an applicant to the register or division of the register must demonstrate achievement of; and
- *Quality Assurance Requirements for education providers* that describe the design and management requirements that an education provider must meet in order to demonstrate that a programme can consistently produce graduates that have achieved the threshold *knowledge and skills* for safe practice.

The threshold level *knowledge and skills* articulated by the Registration Board for entry to the register or division of the register are the threshold requirements against which **all** applicants are assessed against. Therefore, applicants who have completed an education and training programme that is awarded in Ireland **and** applicants who have achieved a qualification that has been awarded outside the State must demonstrate achievement of all the required knowledge and skills as part of the registration process. As such, these regulatory standards apply to **all** individuals seeking registration.

The *quality assurance requirements for education providers* do not apply directly to individuals seeking registration. Rather, they apply to education and training providers in the Republic of Ireland that offer an educational programme that leads into practice of a particular profession. These programmes must meet the *quality assurance requirements* set by the Registration Board to provide assurance that all the graduates from this programme will have achieved the threshold level *knowledge and skills* required for entry to the register or division of the register. These regulatory requirements apply then only to education providers and are used by the Registration Board to assess whether programmes delivered in the Republic of Ireland are suitable for listing as a Board approved qualification on its bye-law for entry to the register or division of the register.

In advance of the opening of the Physiotherapists Register on 30 September 2016, the Physiotherapists Registration Board set its *Standards of Proficiency* (articulating the knowledge and skills required for entry to the general register) and *Criteria for Education and Training Programmes* (the quality assurance requirements for education providers) in February 2015. Following a public stakeholder consultation process in 2017, these *Standards* and *Criteria* were revised and published in November 2018. The *Standards* and *Criteria* are accessible on the CORU website [here](#). The Board set its first Approved Qualifications Bye-

Law in June 2018 that listed the qualifications, awarded in the State, the Board deemed to have met its *Standards* and *Criteria*. This bye-law was subsequently revised in May 2020 to list an additionally approved qualification.

Furthermore, in addition to setting the threshold standards for entry to the register or division of the register, a Registration Board is required under the provisions of the *Health and Social Care Professionals Act 2005 (as amended)* to set, in the form of a bye-law, the requirements for making an application to join the register or division of the register, along with other requirements around admission to the register, including requests for removal from the register, restoration to the register and returning to practice, along with, the setting of the Board's *Code of Professional Conduct and Ethics*.

[b] Requirements for Establishing the Division for Physiotherapist Referrers

With the establishment of divisions of the Physiotherapists Register, the *Standards of Proficiency* and *Criteria for Education and Training Programmes* previously set by the Board are the threshold requirements for entry to the **general division of the Physiotherapists Register**. The Board was then required to set the threshold knowledge and skills and quality assurance requirements for education providers for entry specifically to the division for referrers for radiological diagnostic procedures. This, in turn, requires the revision and updating of the Board's Approved Qualifications Bye-Law.¹

In addition, the establishment of divisions of its existing register, requires the Board review its requirements around admission to the register. To this end, the Board was required to review its *Application for Registration Bye-Law*. Given the specific requirements around registration to the referral for radiological diagnostic procedures division in that registration on the general division is a pre-requisite – the first time that a CORU regulated profession has established a post-registration entry to a separate division of a register – the Board was also required to establish a bye-law that provided for the conditions upon which an application could be made to the referrers division.

The other previously established bye-laws concerning the *Code of Professional Conduct and Ethics*, return to practice, restoration to the register and removal from the register are set as applying to all registrants on the Physiotherapists Register, inclusive of any and all divisions of that register. Therefore, these bye-laws did not require any amendment in order to facilitate the introduction of divisions of the Physiotherapists Register.

¹ Under the provisions of the *Health and Social Care Professionals Act 2005 (as amended)*, a Registration Board is responsible for holding a single register or registers. These register(s) can be divided into divisions in line with the conditions established by the Health and Social Care Professionals Council. While there may be multiple divisions of a register, these are **not** separate registers in and of themselves. Rather, taken together, each of the divisions comprise a register. Under the requirements of the legislation a Registration Board must set an Approved Qualifications Bye-Law listing the approved qualifications for entry to its register.

Therefore, where a Board has divisions of its register, these are identified, along with the associated qualifications for entry, on a single Approved Qualifications Bye-Law. It is for this reason that the Physiotherapists Registration Board has amended its existing Approved Qualifications Bye-Law having established divisions of its register.

In order to establish divisions of its register, and specifically, the introduction of a division specific to one area of post-registration practice, the Physiotherapists Registration Board was required to set the:

- Threshold knowledge and skills needed for entry to this division;
- Quality assurance requirements for education providers specific to education and training programmes, and their associated qualifications, used for entry to this division;
- Approved Qualifications Bye-Law;
- Application for Registration Bye-Law; and
- Conditions for Registration in the Referral for Radiological Diagnostic Procedures Division Bye-Law

[c] Registration Board Approach to Implementation

The Physiotherapists Registration Board's work comprised of three stages, each of which was concerned with the twin priorities of ensuring that the regulatory intervention proposed was proportionate and that it provided the necessary oversight and robustness for public protection:

- *Stage One*: setting the threshold knowledge and skills requirements for entry to the division of the register and the associated quality assurance requirements for education providers;
- *Stage Two*: assessment of programmes presented to the Board for its approval and the revision of its Approved Qualifications Bye-Law;
- *Stage Three*: establishment of the registration conditions and requirements for entry to the referrers division of the register through bye-laws.

Specifically with regard to Stage One of this process, the Board – as identified above – completed an extensive review of its already established *Standards of Proficiency for Physiotherapists* and *Code of Professional Conduct and Ethics* against the only existing comparable standards nationally or internationally published by the Nursing and Midwifery Board of Ireland (NMBI) *Nurse Authority to Refer for Radiological Procedures: Standards and Requirements for Education Programmes* with two chief objectives:

- firstly, identify the knowledge and skills required for the safe practice of referring for radiological diagnostic procedures; and
- secondly, identify what – if any – of these areas of knowledge and skills were already part of the threshold training for physiotherapists' entry into practice (i.e. as articulated in the *Standards of Proficiency for Physiotherapists*) and addressed through the *Code of Professional Conduct and Ethics* that all registered physiotherapists must adhere to.

Evaluating the outcome of the first of these objectives against the second, the Board was able to identify the *outstanding* areas of knowledge and skills that existing practitioners who had demonstrated achievement of the *Standards* and were adhering to their *Code* required in order to practise as a referrer for radiological diagnostic procedures. In approaching the drafting of the threshold knowledge and skills required as a physiotherapist referrer, the Board was mindful of – and proactively applied – the principles of *right touch regulation*, as defined by the Professional Standards Authority, ensuring that the regulatory intervention it was proposing was targeted, proportionate, consistent and transparent.

The outcome of this work were two draft documents, differentiated from the documents for entry to the general division with different titles:

- *Standards of Competence for Referral for Radiological Diagnostic Procedures*: these articulate the knowledge and skills that a registrant must demonstrate on completion of an education and training programme specific to the practice of referring for radiological procedures; and
- *Requirements for Education and Training Providers offering Referral for Radiological Procedures Education and Training Programmes*: these identify the curriculum, assessment and quality assurance requirements an education provider must meet around how its referral for radiological procedures education programme is designed and managed to ensure that all graduates meet the *Standards of Competence*.

Having completed this work, the Board conducted a public consultation process to elicit feedback from stakeholders seeking to ensure that the standards and requirements proposed were:

- clear, understandable and assessable;
- set at threshold for practice as a referrer for radiological diagnostic procedures; and
- that there were no gaps or areas of omission in the proposed standards and requirements.

Ultimately, the Board – through its consultation process – sought to ensure that the regulatory requirements proposed delivered on its object, as defined in the *Health and Social Care Professionals Act 2005 (as amended)*, to protect the public by fostering high standards of professional education, training and competence among registrants of the division for referrers.

Similarly, the Board undertook two further consultation processes – one around the Approved Qualifications Bye-Law and a further one addressing the Registration Bye-Laws – once again seeking stakeholder and public feedback on the requirements set and whether these were at threshold to ensure safe practice among registrants of this division of the Physiotherapists Register.

[6] Public Consultation Processes

The Physiotherapists Registration Board undertook three separate public stakeholder consultation processes in advance of introducing divisions to its register, each of which sought feedback on the regulatory intervention proposed.

Consultation One	Draft <i>Standards of Competence</i> and <i>Requirements for Education Providers</i>	15 July 2024 – 9 August 2024
Consultation Two	Draft Registration Bye-Laws	25 October 2024 – 21 November 2024
Consultation Three	Draft Approved Qualifications Bye-Law	25 November 2024 – 20 December 2024

Consultation One: Draft Standards of Competence and Requirements for Education Providers
A 4-week consultation period launched on Monday, 15 July 2024 and closed on Friday, 9 August 2024.

The consultation process sought to ensure that the draft requirements proposed by the Board were at the threshold level required for safe practice and entry to the professional register to ensure public protection and that they are proportionate and in line with the Board's obligations under Statutory Instrument 413 of 2022 which requires an assessment of proportionality to be conducted before the adoption of new or amending of existing regulations on professions, as required under Directive 2018/958 of the European Parliament and Council.

Several channels were used to publicise the consultation process and invite the submission of observations:

- An advertisement was placed in The Irish Times newspaper on 23 July 2024 and An Seactain on 24 July 2024.
- Information on the consultation was hosted on the CORU website.
- CORU's social media platforms, including X (formerly Twitter) and LinkedIn, were utilised throughout the consultation.
- An online feedback form was developed and a link to this form was included in the public consultation notice on the CORU website and stakeholder email communications.
- An email highlighting the consultation process to an amalgamated list of physiotherapy and radiology education providers of approved programmes and relevant professional bodies.

CORU invited people to participate in the consultation process in several ways:

- They could visit www.coru.ie and choose to complete an online feedback form, print a copy of the form, and post it, or email it to CORU.
- They could email submissions to strategyandpolicy@coru.ie
- They could submit written submissions to Public Consultation, Strategy and Policy Unit, CORU, Infinity Building, George's Court, George's Lane, Smithfield, Dublin 7, D07 E98Y.

A total of 65 responses were received through this consultation process.

Source	Number of Respondents
Online Questionnaire	62
Email Submissions	3
Total Number of Submissions	65

Following the close of the consultation process, the Board reviewed all the submissions received before finalising, issuing and publishing its revised *Standards of Competence and Requirements for Education and Training Providers*.

In the main, feedback confirmed that the *Standards and Requirements* were set at threshold for entry to the division of the register and were clear, understandable and assessable.

While some feedback suggested that there were omissions from the documents – specifically in relation to the area of clinical governance arrangements – the Board noted that this was outside its regulatory scope and that the development of such guidelines was managed through the Department of Health’s Expert Advisory Group.

On the basis of the feedback received, only one change was made to the proposed documents to aid clarity and understanding.

Detailed analysis of the consultation feedback by the Physiotherapists Registration Board, along with rationales for the decisions taken, is available in its *Public Consultation Report on the Physiotherapists Registration Board Standards of Competence and Requirements for Education Providers*, available on the CORU website here: <https://coru.ie/public-protection/publications/consultation-reports/physiotherapists-registration-board/>

At its meeting on 11 September 2024, the Physiotherapists Registration Board adopted its *Standards of Competence and Requirements for Education Providers*. These documents were disseminated to stakeholders immediately following the Board’s approval and published online thereafter.

Consultation Two: Draft Registration Bye-Laws

A 4-week consultation period launched on Friday, 25 October 2024 and closed on Thursday, 21 November 2024.

The consultation process sought to ensure that the draft requirements proposed by the Board were at the threshold level required for safe practice and entry to the professional register to ensure public protection and that they are proportionate and in line with the Board’s obligations under Statutory Instrument 413 of 2022 which requires an assessment of proportionality to be conducted before the adoption of new or amending of existing regulations on professions, as required under Directive 2018/958 of the European Parliament and Council.

Similarly to the previous consultation on the *Standards and Requirements*, the consultation was publicised through a range of print and online media whereby respondents were invited to provide feedback through completion of an online questionnaire or email submission to consultation@coru.ie or a hard copy, written submission.

Two completed responses were received to the consultation with no respondent identifying any areas of concern. Indeed, both responses articulated support for the change in policy and the regulatory intervention proposed to facilitate it.

Source	Number of Respondents
Online Questionnaire	2
Email Submissions	0
Total Number of Submissions	2

A copy of the consultation feedback and analysis is available in its *Public Consultation Report on the Physiotherapists Registration Board Registration Bye-Laws* is available on

the CORU website here: <https://coru.ie/public-protection/publications/consultation-reports/physiotherapists-registration-board/>

Following a review of the feedback, the Board made no changes to either of its registration bye-laws. These bye-laws were signed with the seal of the Physiotherapists Registration Board on 7 January 2025. Copies of both bye-laws are accessible here:

- [Physiotherapists Registration Board Approved Qualifications Bye-Law](#)
- [Physiotherapists Registration Board Conditions for Registration in the referral for Radiological Diagnostic Procedure Division Bye-Law](#)

Consultation Three: Draft Approved Qualifications Bye-Law

Following a detailed programme approval process whereby Board approval was granted to the single applying qualification, a 4-week consultation period launched on Friday, 25 November 2024 and closed on Friday, 20 December 2024 in relation to the listing of this approved qualification on the Board’s Approved Qualifications Bye-Law.

The consultation process sought to ensure that the draft requirements proposed by the Board were at the threshold level required for safe practice and entry to the professional register to ensure public protection and that they are proportionate and in line with the Board’s obligations under Statutory Instrument 413 of 2022 which requires an assessment of proportionality to be conducted before the adoption of new or amending of existing regulations on professions, as required under Directive 2018/958 of the European Parliament and Council.

Similarly to both previous consultation processes, this consultation was publicised through a range of print and online media whereby respondents were invited to provide feedback through completion of an online questionnaire or email submission to consultation@coru.ie or a hard copy, written submission.

A total of 14 responses were received as part of this consultation process.

Source	Number of Respondents
Online Questionnaire	14
Email Submissions	0
Total Number of Submissions	14

A copy of the consultation feedback and analysis is available in its *Public Consultation Report on the Physiotherapists Registration Board Approved Qualifications Bye-Law* is available on the CORU website here: <https://coru.ie/public-protection/publications/consultation-reports/physiotherapists-registration-board/>

The Board reviewed the feedback at its meeting on 11 February 2025 and concluded that there were no issues emerging that impacted on the inclusion of the approved qualification on its Approved Qualifications Bye-Law. Following approval of the Bye-Law by the Minister for Health on 10 April 2025, it was signed with the seal of the Physiotherapists Registration Board on 6 May 2025. A copy of this bye-law is available here: [Physiotherapists Registration Board Application for Registration Bye-Law](#)

[6] Enforcement and Compliance of Regulatory Intervention

The establishment of divisions of the Physiotherapists Register does not require additional enforcement or compliance processes.

The existing requirements to ensure compliance with the Board's regulations, as detailed under the provisions of the *Health and Social Care Professionals Act 2005 (as amended)*, remain unchanged:

- Following publication of the Board's *Standards and Requirements*, education providers seeking approval from the Board for listing of a qualification on the Approved Qualifications Bye-Law will be assessed against the published requirements;
- Programmes approved by the Board and listed on its Approved Qualifications Bye-Law will be subject to monitoring by the Board within 5 years of their initial approval decision;
- Applicants with an Irish awarded qualification must hold a qualification that is listed on the Approved Qualifications Bye-Law;
- Applicants holding internationally awarded training in the area of referral for radiological diagnostic procedures will be assessed against the same threshold *Standards of Competence* as Irish-qualified graduates on the referrers division; and
- Registered Physiotherapists, regardless of whether they are registered on the general division only or on both divisions will be subject to their *Code of Professional Conduct and Ethics*.

[6] Review Mechanisms

The Registration Board cyclically reviews its education and training requirements, typically between every 5 and 7 years. In the introduction to its *Standards and Requirements*, the Board has identified it will keep its requirements under review and make any changes necessary in light of developing circumstances.

Furthermore, the Board will review the establishment of divisions of its register in light of any future legislation amendments to the *Health and Social Care Professionals Act 2005 (as amended)*.

[7] Publication

This Regulatory Impact Assessment will be published on the CORU website: <https://coru.ie/public-protection/publications/consultation-reports/physiotherapists-registration-board/>