

Q-Pulse Database	DIAIMA	
Document Number	EP-1	
Document Title	Entitlement of Duty Holders for Medical Exposures	

1. Objectives

This document describes the procedures that will be used throughout NHS Greater Glasgow and Clyde to identify individuals entitled to act as duty holders, in accordance with the IR(ME)R2017.

This includes procedures to limit the scope of entitlement of each duty holder. The scope of entitlement for practitioners and operators shall be limited to those competences for which they have been properly trained.

2. Responsibilities

IRMER Lead

The IRMER Policy Lead will ensure that the structures described in this document for entitlement of IRMER duty holders are in place, and will audit compliance with these structures by liaising annually with each Clinical Director for medical and dental staff, and General Manager for other staff (or the individual with the equivalent role within each directorate who is authorised by the IRMER Policy Lead to entitle duty holders) to ensure that provisions for regular evaluation of the scope of entitlement of practitioners and operators are being maintained.

The IRMER Policy Lead is responsible for entitling all referrers who refer patients for medical or dental exposures to be carried out within NHS Greater Glasgow and Clyde. Entitlement of referrers shall be in accordance with Section 3 of this procedure.

The IRMER Policy Lead is responsible for entitling all medical and dental staff who provide a clinical evaluation within NHS Greater Glasgow and Clyde. Entitlement of operators for Clinical Evaluation shall be in accordance with Section 3 of this procedure and this includes Non-GGC Consultant Radiologists involved in off-site clinical evaluation and locum staff (NHS and agency).

The IRMER Policy Lead is responsible for entitling all medical staff for the taking of radioactive blood samples within NHS Greater Glasgow & Clyde. Entitlement of operators for the taking of radioactive blood samples shall be in accordance with Section 3 of this procedure.

The IRMER Policy Lead is responsible for directly providing additional entitlements to Clinical Directors and the Scientific Director where these are required.

Clinical Directors

Clinical Directors are responsible for entitling medical and dental staff within their service, who provide a clinical evaluation in addition to that given by the IRMER Lead. Entitlement of operators for additional Clinical Evaluation shall be in accordance with Section 4 of this procedure and this includes locum staff (NHS and agency).

Clinical Directors are responsible for entitling medical and dental staff as practitioners and operators (excluding clinical evaluation) within their area of responsibility before they undertake these roles for the first time within NHS Greater Glasgow and Clyde. Entitlement of practitioners and operators (excluding clinical evaluation) shall be in accordance with Section 4 of this procedure and this includes locum staff (NHS and agency).

Clinical Directors will ensure that arrangements are in place to maintain an up-to-date record of qualifications, competencies, training undertaken and Continuing Medical Education (CME) / Continuing Professional Development (CPD) by each such entitled practitioner and operator. This shall be in accordance with Section 6 of this procedure.

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General Managers

General Managers are responsible for entitling non-medical staff within their service, who provide a clinical evaluation. Entitlement of operators for Clinical Evaluation shall be in accordance with Section 4 of this procedure and this includes locum staff (NHS and agency).

General Managers are responsible for entitling non-medical staff as practitioners and operators within their area of responsibility before they undertake these roles for the first time within NHS Greater Glasgow and Clyde. Entitlement of practitioners and operators shall be in accordance with Section 4 of this procedure and this includes locum staff (NHS and agency).

General Managers will ensure that arrangements are in place to maintain an up-to-date record of qualifications, competencies, training undertaken and Continuing Professional Development (CPD) by each such entitled practitioner and operator. This shall be in accordance with Section 6 of this procedure.

Scientific Director

The Scientific Director is responsible for entitling non-medical staff within their service, who provide a clinical evaluation. Entitlement of operators for Clinical Evaluation shall be in accordance with Section 4 of this procedure and this includes locum staff (NHS and agency).

The Scientific Director will entitle suitably qualified and competent Physics staff to undertake the roles of Medical Physics Experts, operators and practitioners within their area of responsibility before they undertake these roles for the first time within NHS Greater Glasgow and Clyde. Entitlement of practitioners and operators shall be in accordance with Section 4 of this procedure, and this includes locum staff (NHS and agency).

In addition, the Scientific Director will ensure that these staff have received entitlement before they undertake these roles for the first time ***out with but on behalf*** of NHS Greater Glasgow and Clyde. The other Health Boards may use the NHS Greater Glasgow and Clyde entitlement letter as evidence to allow them to issue a letter in which they issue entitlement.

The Scientific Director will ensure that arrangements are in place to maintain an up-to-date record of qualifications, competencies, training undertaken and Continuing Professional Development (CPD) by each such entitled Medical Physics Expert, operator or practitioner. This shall be in accordance with Section 6 of this procedure.

The Scientific Director will entitle suitably qualified and competent staff who, although not directly employed by NHS Greater Glasgow and Clyde, require entitlement in order to perform duties on behalf of the organisation. This entitlement may be based on the entitlement from their primary organisation.

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Summary Table

Medical	Non-Medical
R	R
O3 as per EP-GUID-003	O3
O3 in addition to EP-GUID-003	
O2 (sample only)	O2
O2	
O1	O1
O	O
P	P
O4	O4
-	MPE*

*Scientific Director only

Key

IRMER Lead	Clinical Director	General Manager / Scientific Director
R = Referrer O4 = Operator for Authorisation of medical exposures using written guidelines approved by an IRMER entitled Practitioner O3 = Operator for Clinical Evaluation O2 = Operator for Screening / Acquisition / Administration / Sample / Image Processing O1 = Operator for Equipment, O = Operator, P = Practitioner, MPE = Medical Physics Expert* For O2 Screening = operation of screening pedal (physically or verbal direction) Acquisition = capture of images (physically or verbal direction) Administration = administration of radioactive material Sample = taking of radioactive blood samples Image Processing = Nuclear Medicine post-process image/data manipulation For O1 Equipment = trained in use of equipment		

3. Entitlement of Staff by the IRMER Lead

Medical Staff

Medical staff within NHSGGC will receive an entitlement letter from the IRMER Lead which includes the following

- The IRMER Policy Lead will entitle all medical and dental staff registered with the General Medical Council or General Dental Council as **referrers** for medical exposures automatically by virtue of their registration
- Entitlement of medical and dental staff as **referrers** for medical or dental exposures to be carried out within Greater Glasgow and Clyde NHS Board will be by staff group, and the scope of entitlement of each staff group shall be as defined in EP-GUID-003
- The IRMER Policy Lead will entitle all medical and dental staff registered with the General Medical Council or General Dental Council as **operators for clinical evaluation** as detailed in EP-GUID-003 automatically by virtue of their registration

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- Entitlement of medical and dental staff as **operators for clinical evaluation** for medical or dental exposures within Greater Glasgow and Clyde NHS Board will be by staff group, and the scope of entitlement of each staff group shall be as defined in EP-GUID-003
- The IRMER Policy Lead will entitle all medical staff registered with the General Medical Council as **operators for the taking of radioactive blood samples** automatically by virtue of their registration
- Any doctor or dentist whose category in EP-GUID-003 changes, shall be deemed to be entitled by the IRMER Policy Lead for the changed category.

The IRMER Leads of the Scottish Health Boards have a written agreement to accept referrals from other health boards.

Non-Medical Staff

The IRMER Policy Lead may entitle named health care professionals who are not medical or dental staff to act as referrers for a limited range of medical exposures. The Imaging Approval Panel will advise the IRMER Policy Lead whether it is appropriate for such persons to be entitled, following the procedure in EP2. Advice on entitlement of non-medical referrers working in radiotherapy for exposures specifically associated with radiotherapy will be provided to the IRMER Policy Lead on a case by case basis by the Radiotherapy Management Group, following procedure x in the Beatson quality system.

The scope of their referral entitlement shall be as detailed in the approved application, a copy of which will be sent with their entitlement letter.

4. Entitlement of Staff by Clinical Director / General Manager / Scientific Director

If staff within the service require entitlement in addition to that provided by the IRMER Lead then the service, shall have in place a Level 2 entitlement procedure which has been authorised by the Service Lead that:

- identifies the Clinical Director responsible for entitlement of medical and dental staff
- identifies the General Manager/Scientific Director responsible for entitlement of non-medical staff
- identifies those managers who are authorised to assess the competences of operators and practitioners, and define the scope of their entitlement
- identifies staff groups, and defines the qualifications, experience and basic training required for each relevant staff group to be considered for entitlement as a practitioner or operator
- lists competences against which members of each identified staff group shall be assessed.

Detailed guidance on Competency Assessors and Competency Assessments in EP-Guidance-002.

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5. Appointment of MPEs by Employer

The MPE Entitlement Letter issued by the Scientific Director constitutes a formal appointment by the Employer as an MPE for the relevant Scope of Practice.

6. Training Records

The Clinical Directors for medical and dental staff, the Scientific Director for physics staff and General Managers for other staff (or the individual with the equivalent role within each directorate) shall ensure that arrangements are in place to maintain an up-to-date record of qualifications for each operator, practitioner or Medical Physics Expert.

Clinical Directors for medical and dental staff, the Scientific Director for physics staff and General Managers for other staff (or the individual with the equivalent role within each directorate) shall make provisions to ensure that each operator, practitioner and medical physics expert under their management maintains a folder with an up-to-date record of their own IRMER competencies linked to their scope of entitlement, and supported by verifiable records of training and experience.

Where a training record includes a list of elements requiring to be signed off by a trainer (someone currently competent for that task), the provisions should ensure that for experienced staff it shall be sufficient for the competency assessor to 'write across' these training elements that that staff member is 'deemed competent by experience'.

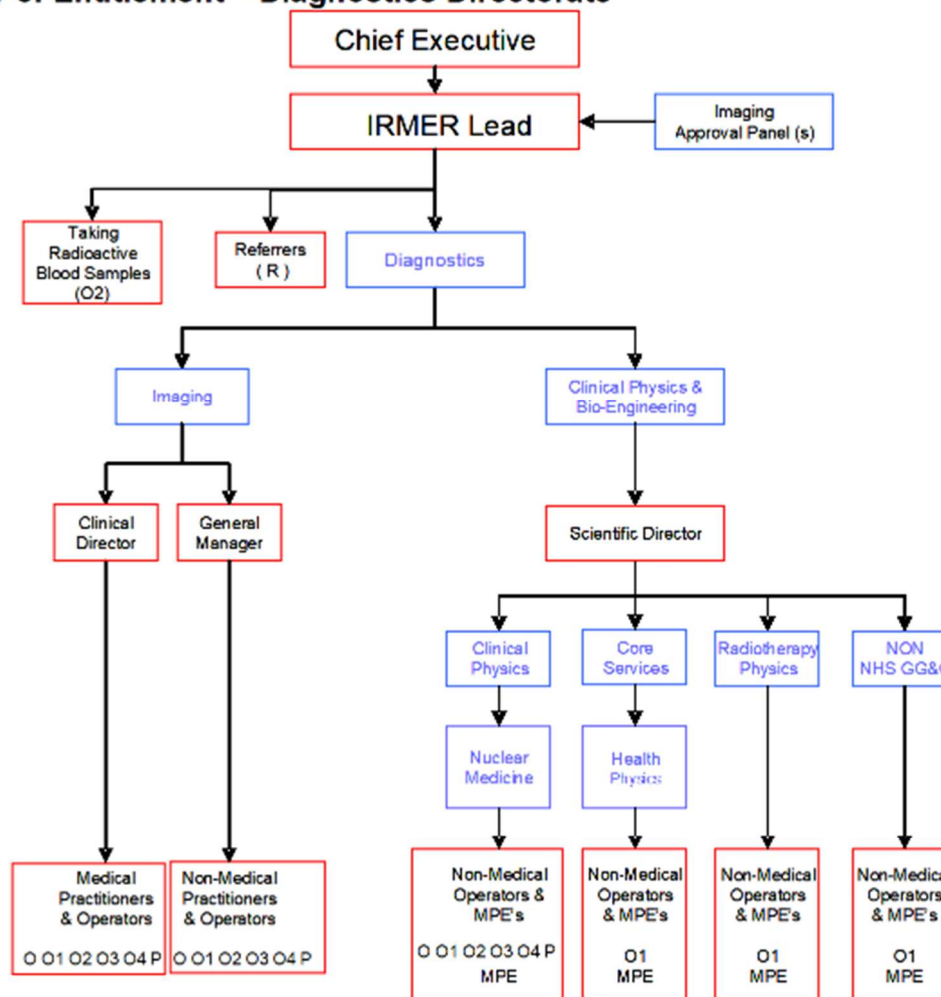
Records of training and experience held by each operator, practitioner and medical physics expert shall be inspected by the competency assessor to whom responsibility has been delegated, as part of the appraisal process. This will provide the basis for a review of the competences contained within their scope of entitlement.

If the level of experience and clinical involvement to maintain that competence is deemed insufficient to support the continued maintenance of a particular competence, then this competency will be removed from the individual's scope of entitlement by the Competency Assessor.

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7. Summary of Entitlement – Diagnostics Directorate

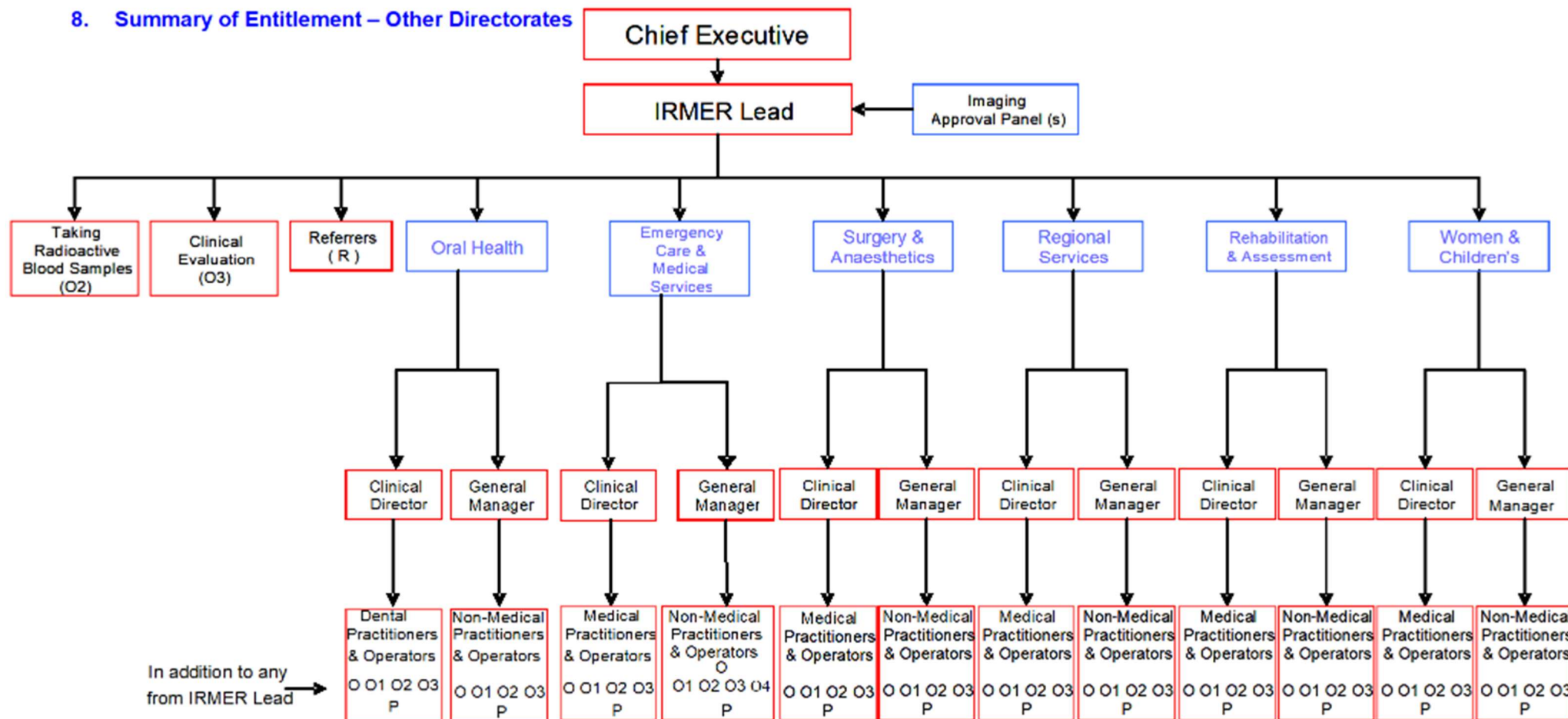


O= Operator, O1 = Equipment Operator, O2 = Screening/Acquisition/Admin/Sample/Image Processing, O3 = Clinical Evaluation, P = Pr
O4 = operator authorisation using guidelines written by an IRMER entitled Practitioner

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8. Summary of Entitlement – Other Directorates



O= Operator, O1 = Equipment Operator, O2 = Screening/Acquisition/Admin/Sample/Image Processing, O3 = Clinical Evaluation, O4 = Operator Authorisation, P = Practitioner, R = Referrer

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