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Procedure to Identify Individuals Entitled to Act as Referrers, Practitioners, Operators, and Medical Physics Experts and a Description of Their Duties

NHS Greater Glasgow and Clyde

1. Objective

Employer's Procedure 'EP1' describes the procedures that will be used throughout NHS Greater Glasgow and Clyde to entitle staff to act as referrer, practitioner or operator (including Medical Physics Experts). The scope of entitlement of these duty holders shall be limited, in accordance with qualifications, experience and training.

This Procedure defines the duties, identification & training of staff entitled to act as referrer, practitioner or operator. The actual scope of entitlement for each individual duty holder who meets these basic qualifications and experience requirements is then conferred by the appropriate Local Service Lead (LSL) with due regard to the need for adequate training.

2. Responsibilities

Where necessary the adequacy of the qualifications (Guidance Documents), training and medical /other knowledge of any individual or group will be assessed by an appropriate IRMER Approval Panel (IAP), acting on behalf of the IRMER Policy Lead.

All staff are expected to maintain their knowledge through update training, demonstrated through CME or CPD.

Local Service leads must ensure that, when recruiting to a vacant or new post, if there is a requirement for the post-holder to act in any of the above roles that this is made explicit in the job description and the adequacy of training assessed at interview. In the event that additional training is required, the person must not act in an unsupervised capacity until evidence of additional appropriate training is provided.

3. Referrers

Duties

A referrer is a registered health care professional who is entitled (in GGC) to refer individuals for medical exposure. The referrer must be competent to understand the reported findings and to ensure that appropriate action is taken on those findings.

The referrer must:

- Provide the Practitioner with sufficient personal and clinical information (such as previous diagnostic information or medical records) relevant to the medical exposure requested, including pregnancy and breast feeding status to enable the practitioner to identify the patient and decide whether there is sufficient net benefit.
- Identify whether the exposure is for non-medical purposes.
- Identify whether the exposure is only for research purposes.
- Identify whether the exposure is for asymptomatic individuals

Identification and training

All staff undertaking referral must be adequately trained. For medical staff employed by NHSGGC this is undertaken at induction and includes preparing for practice and LearnPro 156 IR(ME)R for Doctors and Dentists.

The list of staff groups entitled directly by the IRMER Lead to act as referrers is given in EP-Guidance-003. This includes staff from NHS GGC and any staff referring into NHS GGC services.

Health Care Professionals will be entitled only if evidence presented is deemed sufficient to confirm both their need to act as a referrer and their ability to provide the medical information necessary for

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the practitioner to justify the exposure. An appropriate IRMER Approval Panel will advise the IRMER Policy Lead whether the evidence for any such group or individual is sufficient. Such groups or individuals will only refer for those procedures for which written approval has been given.

In the event that a person who is not entitled to refer makes a referral, the practitioner (or operator allowed to authorise exposures under written guidelines) will not authorise the exposure and will inform the LSL.

4. Practitioners

Duties

A **Practitioner** is a registered medical or dental practitioner or other registered health care professional who is entitled (in GGC) to take responsibility for an individual exposure. The primary function of the Practitioner is to undertake the justification of medical exposures, taking into account the risks and benefits while considering alternative investigations or procedures.

In the case of an exposure to a carer or comforter, the Practitioner must justify that sufficient net benefit will take place.

If the practitioner is aware prior to the exposure that no clinical evaluation will occur, then the exposure is not justified and cannot lawfully take place.

Identification and training

In order to justify a medical exposure the practitioner must be adequately trained. Firstly, the practitioner must be able to assess the risk from ionising radiation. The type of training required to assess that risk is described in IR(ME)R Regulation 17 and Schedule 3 of the Regulations. Qualified radiologists, by the nature of their professional training, fulfil this requirement and need no further training of this type for most investigations.

The practitioner must also be able to assess the potential benefit from the radiation exposure and be capable of recommending an alternative investigation with no or lower radiation exposure, as required by IR(ME)R Regulation 11. This implies sufficient medical training and knowledge including a full understanding of the reason for the examination, the merits of alternative radiological examinations, the merits of alternative non-radiological examinations and the impact of the examination on clinical management.

It is recognised that there are situations where it would be appropriate for other health care professionals, e.g. radiographers, to act as practitioners. In this situation, it is important that training and competency assessment are carried out.

For procedures involving the administration of radionuclides the Practitioner must hold a Practitioner license and is recognised as adequately trained to act as a practitioner (for the nuclear medicine procedures detailed on his/her license – issued by ARSAC).

Therapeutic procedures in nuclear medicine (molecular radiotherapy) are justified by a practitioner with an appropriate Practitioner license. Operators authorising Molecular Radiotherapy must have the explicit written permission of the practitioner.

5. Operators

Duties

An **Operator** is any person who is entitled (in GGC) to carry out practical aspects of a medical exposure. This includes the following:

• correct identification (ID) of the individual to be exposed (EP7)

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- checking the pregnancy or breastfeeding status of the patient where appropriate as indicated in relevant procedure (EP8 and EP9)
- authorising an exposure an exposure may be authorised by an operator when acting in accordance with written guidelines approved by the practitioner; for Molecular Radiotherapy the operator must in addition have the written approval of the practitioner to authorise exposure.
- authorising an exposure to a carer or comforter where there are no special circumstances and operator authorisation can take place
- physically effecting the exposure in an X-ray examination
- acquiring or processing images
- administering radiopharmaceuticals in nuclear medicine procedures
- quality assuring the equipment which controls the exposure or processes the resultant images
- clinical evaluation of radiation exposure. Where there is a local agreement in place relating to evaluation, this must be followed.

Note that there may be more than one *Operator* involved in a single exposure.

The scope of entitlement must clearly show explicit entitlement for confirming patient ID, and for checking pregnancy and breast feeding status. It must separate entitlement for the clinical evaluation from the practical aspects of the exposure,

Identification and training

Adequate training for operators effecting an exposure includes sufficient clinical knowledge plus sufficient theoretical and practical knowledge of radiation and its application as detailed in IR(ME)R Schedule 3. For example, HCPC registered radiographers are accepted as adequately trained for all plain film X-ray investigations.

6. Medical Physics Expert

A *Medical Physics Expert* is a registered clinical scientist who has knowledge, training and experience to act or give advice on matters relating to radiation physics applied to exposure.

A Medical Physics Expert (MPE) will be involved as detailed in Regulation 14 & will be formally appointed by the Employer for a relevant Scope of Practice. Experts entitled in the capacity will hold a MPE Certificate of Competence issued by RPA2000. Their Scope of Practice will be directly related to their training and experience, & their assessed competences.

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