

# Accredited Registers

## Notification of Change

The Register of Clinical Technologists (RCT)

November 2020

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## About the Register of Clinical Technologists (the RCT)

The RCT registers clinical technologists working in:

- nuclear medicine
- radiotherapy physics
- radiation physics
- medical engineering
- radiation engineering
- rehabilitation engineering
- renal technology.

Its work includes:

- Setting and maintaining standards of practise and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep up their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

The register is managed by a Management Board consisting of members from three professional bodies for clinical technologists: the Institute of Physics and Engineering in Medicine (IPEM), which holds the register, the Association of Renal Technologists (ART) and the Institute of Healthcare Engineering and Estate Management (IHEEM).

The RCT was first accredited on 7 September 2015. As of July 2020, there were 2,192 registrants on the RCT's register.

## Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every twelve months.

Once accreditation has been granted, significant changes to an Accredited Register need to be assessed by the Authority to ensure ongoing compliance with the Accreditation Standards. These are submitted to the Authority as a notification of change.

Changes can be approved by a Moderator in cases where compliance with the Standards are not affected by the change. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to approve the change or approve the change with conditions. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

## Notification of Change

The RCT operates a register for healthcare scientists specialising in the practical application of physics, engineering and technology to clinical practice.

Clinical technologists work in the NHS, private health care, academic institutions and the medical device industry as, for example, Radiotherapy Physics Technologists or Renal Technologists.

The RCT is proposing to add Sonographers as a new occupation to its register. Sonographers are healthcare professionals who undertake and report on diagnostic, screening or interventional ultrasound examinations.

RCT-registered sonographers will hold minimum qualifications equivalent to a [Consortium for the Accreditation of Sonographic Education](#) (CASE)- accredited postgraduate certificate, or diploma in medical ultrasound, BSc (Hons) medical ultrasound, or an honours degree apprenticeship in clinical ultrasound.

The RCT aims to provide a register for practitioners, whether working solely as sonographers, or as part of wider roles, such as undertaken by Health and Care Professions Council (HCPC) registered radiographers. This will allow practitioners to demonstrate commitment to specific standards for the sonography profession.

The RCT states that it will be transferred ownership of the existing [Public Voluntary Register of Sonographers \(PVRS\)](#) currently operated by the Society of Radiographers (SoR) and [College of Radiographers](#) (CoR). The PVRS currently registers sonographers not under regulation by statutory bodies such as the Health and Care Profession Council (HCPC) and Nursing and Midwifery Council (NMC). The PVRS will however register regulated practitioners with the HCPC, NMC or General Chiropractic Council (GCC).

The RCT maintains Scopes of Practice for each occupation it registers, which define the attributes that would be expected from a newly qualified clinical technologist at the point of registration. The RCT advises that it has mapped the PVRS register's standards for entry to its Scopes of Practice, having determined that those standards can be adopted without change. The RCT will draw on expertise from the CoR when assessing new applications to its register.

The RCT advises that existing PVRS registrants will be eligible to transfer to the RCT's new register and will be required to confirm that they continue to meet the required standards, abide by the RCT Code of Conduct and undertake CPD in line with current RCT practice.

## Outcome

The Authority decided that the changes would not negatively impact on the RCT's compliance with the Accreditation Standards so approved the change.

The change was approved by a Moderator following a review of evidence gathered by the Accreditation team and supplied by the RCT.

No Conditions of Accreditation were issued.

The following Recommendations were issued to be implemented by submission of annual renewal documentation.

1. The RCT should assure that risks related to sonography are considered and addressed within overall reviews of risk. (paragraph 3.8)
2. The RCT should assure it has sufficient mechanisms to maintain up to date knowledge of good practice within sonography. (paragraph 7.4)

The following report provides detail supporting the outcome.

# Assessment against the Standards for Accredited Registers

## Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 The RCT proposed to add the occupation and title of 'sonographer' to its register. Sonographers, also known as ultrasonographers or ultrasound practitioners in the UK are health practitioners who use ultrasound imaging or sonography/ultrasonography to carry out examinations either for diagnostic, screening or interventional purposes.
- 1.2 As part of their role sonographers will:
  - assess referrals for ultrasound imaging
  - undertake the most appropriate examination to aid the diagnosis
  - record images appropriate to the diagnosis
  - report on the results of diagnostic, screening or interventional ultrasound examinations.
- 1.3 Sonographers often work within the NHS but also across a range of different contexts including within hospital radiology departments, independent hospitals, community GP settings, independent providers, agencies and in small businesses/partnerships.<sup>1</sup> Sonographers work in similar roles throughout the UK.
- 1.4 As of 2019 most sonographers throughout the United Kingdom were either qualified nurses or radiographers and statutorily registered by the Nursing and Midwifery Council (NMC) or the Health and Care Professions Council (HCPC). Sonography is not however a regulated title or occupation.<sup>2</sup> Regulated professionals who act solely as sonographers may be eligible to leave their statutory regulation, if permitted by their conditions of employment. The SoR recommends that statutory registration is maintained whenever possible, but this is not mandatory.
- 1.5 At present, sonographers not under statutory regulation may register with the Public Voluntary Register of Sonographers (PVRS) administered by the College of Radiographers (CoR). The CoR is a charity which '[promotes imaging and radiotherapy education, science and practice](#)'. It works together with the Society of Radiographers (SoR), a trade union and professional body for the radiographic workforce. The SoR had approached the RCT regarding taking over the PVRS by its next registrant renewal date of 1 March 2021.
- 1.6 The RCT confirmed to the Authority that it would do so and was working to ensure all documentation and procedures were in place by that date.
- 1.7 The RCT advised that as of April 2020 there were 233 sonography practitioners on the existing PVRS register not registered with a statutory

<sup>1</sup> The Professional Standards Authority (2019) [Right-touch assurance for sonographers based on risk of harm arising from practice – Report to Health Education England](#)

<sup>2</sup> Ibid.

regulator. At that time there were 469 PVRS registrants cross-registered with a statutory regulator.

- 1.8 The RCT currently operates an Accredited Register for clinical technologists working in nuclear medicine, radiotherapy physics, radiation physics, medical engineering, radiation engineering, rehabilitation engineering and renal technology. The RCT has defined for each occupation a '[scope of practice](#)' which describes the attributes that would be expected from a newly qualified clinical technologist at the point of registration.
- 1.9 The RCT advised that the current standards for entry to the PVRS have been assessed and mapped to the RCT Scopes of Practice. The RCT will add the sonographers to its register under a scope of practice for sonography.
- 1.10 The RCT's register will continue the PVRS' practice of registering both unregulated and regulated practitioners. General Medical Council (GMC) registered practitioners may only register if they are registered *without a license*, that is, not working as a doctor.
- 1.11 The Consortium for the Accreditation of Sonographic Education (CASE) is 'is an organisation that exists to accredit sonographic courses delivered within the UK'. The definition of a sonographer applied with the [CASE Standards](#) is:

'A healthcare professional who undertakes and reports on diagnostic, screening or interventional ultrasound examinations. They will hold as a minimum qualifications equivalent to a postgraduate certificate or diploma in medical ultrasound, BSc (Hons) clinical ultrasound or an honours degree apprenticeship in clinical ultrasound that has been accredited by the Consortium for the Accreditation of Sonographic Education (CASE). They are either not medically qualified or hold medical qualifications but are not statutorily registered as a doctor in the UK'
- 1.12 The Authority considered that the work of sonographers met the definition for working in a health care occupation set out in the National Health Service Reform and Health Care Professions Act 2002, section 25E (8) - 'Health care' includes: all forms of health care for individuals, whether relating to physical or mental health; and procedures that are similar to forms of medical or surgical care but are not provided in connection with a medical condition.'
- 1.13 The Authority found that compliance with this Standard was not affected by the change.

## **Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers**

- 2.1 The Authority noted that the RCT demonstrates its commitment to protecting the public through: its standards, its requirements for its registrants to undertake CPD, to have appropriate indemnity cover, to make relevant declarations of good character and good health, and also through its complaints procedure.
- 2.2 The RCT demonstrated commitment to protecting the public and promoting confidence in the sonography occupation by bringing unregulated practitioners under its defined scopes of competence and conduct. The RCT highlighted

the need to ensure that there was continuation of registration for the unregulated sonography workforce following closure of the PVRS. Being part of an Accredited Register would ensure that sonography practitioners demonstrated achieving a set standard of education and training, meet ongoing training requirements and could be sanctioned or removed from the register for misconduct or lack of competence.

- 2.3 Due to the nature of the role, sonographers are likely to come into contact with patients with different levels of vulnerability or agency. The Authority had previously considered the RCT's knowledge of and approach to safeguarding matters within a previous annual review of accreditation. The RCT had provided its *Policy on Register of Clinical Technologists' Reporting in Safeguarding Cases*. The majority of RCT registrants work within the NHS where mandatory safeguarding training is provided.
- 2.4 The Authority found that compliance with this Standard was not affected by the change.

### Standard 3: risk management

- 3.1 The role of a sonographer requires a high degree of skill and clinical knowledge across a range of areas and for individuals to practise with significant autonomy. There are inherent risks arising from sonographers' practice including the misdiagnosis and misuse of ultrasound equipment and risks associated with carrying out intimate examinations.<sup>3</sup>
- 3.2 The RCT provided a risk matrix demonstrating awareness of risks relating to sonography practice and mitigating actions for these. These included risk of harm to patients through misdiagnosis, misuse of equipment, poor hygiene practices, and by misconduct such as sexual assault during intimate examinations. The matrix noted mitigating actions in place included accredited qualifications, employers' clinical governance procedures, CPD requirements and equipment hygiene requirements.
- 3.3 The Authority's review of the risk matrix noted that most of the risks identified were listed as static, with some increasing. The Authority asked how RCT registration would assist to decrease the likelihood/impact of these risks, in line with the risks listed on its RCT's existing risk matrix. The RCT responded:
- 3.4 'Transferring the PVRS to the RCT would help decrease these risks due to sonographers not belonging to a PSA accredited register. This would also prevent the risk increasing in the event of the sonographers no longer having a register if this transfer didn't happen. The RCT maintains a risk register which identifies risks associated with the voluntary nature of registration and any new risks as a result of this transfer would be included in this register.'
- 3.5 The Authority noted that the 'Report to Health Education England' highlighted difficulties in analysing incident data when assessing the risks to this occupation. The RCT had previously advised of its understanding of a risk of registrants failing to report adverse incidents. The Authority asked if the RCT had guidance or requirements that could assist the collection of such information and its risk management practices. The RCT responded:

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<sup>3</sup> Ibid.

- 3.6 'The RCT has issued communication to all registrants about reporting incidents and has recently updated its code of conduct. It currently does not collect any data on registrants failing to report risks, as adverse incident reporting happens more at an individual trust level and not through the RCT.'
- 3.7 The Authority noted that the RCT's depiction of static or increasing risks did not appear to reflect insufficient awareness of risks relating to sonography or lack of mechanisms to address these. If the Notification was approved the Authority would review the RCT's review of risks for sonographers within future assessments.
- 3.8 The Authority issued a Recommendation for the RCT to consider how it could assure that it effectively addresses risks related to sonography within its regular reviews. (Recommendation One)
- 3.9 The Authority found that compliance with this Standard was not affected by the change.

**Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register**

- 4.1 The RCT did not advise fees for sonographer registrants would differ from existing registrant categories.
- 4.2 The Authority found that compliance with this Standard was not affected by the change.

**Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively**

- 5.1 This Standard is impacted by other Standards.
- 5.2 The Authority found that compliance with this Standard was not affected by the change.

**Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public**

- 6.1 The RCT has a defined knowledge base underpinning the occupations covered by its register. RCT's [Scopes of Practice](#) 'describes the attributes that would be expected from a newly qualified Clinical Technologist at the point of registration.' The 'Scope of Practice' document provides broad overviews of specific roles, such as for Nuclear Medicine Technologists and the specialized tasks that newly qualified technologists must be able to perform.
- 6.2 RCT's [Clinical Technology Degree Syllabus](#) includes learning outcomes, indicative content and clinical practice placement competencies that must be achieved, noting core subjects for all clinical technologists and specialist topics such as for Radiation Physics Technology or Renal Technology. Core competencies include Health & Safety, Research & Development, Patient/client care, Management, Communication Skills, Quality Assurance and Information Management & Technology.

- 6.3 The RCT's knowledge base is made explicit to the public, for example, the [Standards](#) section of the RCT website.
- 6.4 Sonography has a defined knowledge base set out in National Occupational Standards and other sources, such as:
- Skills for Health (2019) Cl.C.2019 [Perform, interpret and report on ultrasound examinations](#)
  - Skills for Health (2019) Cl.I.2019 - [Perform image guided procedures and/or interventions](#)
  - The CASE Standards for Sonographic Education including the standards of proficiency for a sonographer (appendix 1 of the CASE standards document <http://www.case-uk.org/standards/>)
  - Rheumatoid arthritis in adults: diagnosis and management - Evidence review - [A Ultrasound for diagnosis NICE guideline NG100](#)
- 6.5 The RCT confirmed that Sonographers would be included in its published documentation as an additional scope of practice. The RCT's scopes of practice are publicly accessible.
- 6.6 The Authority found that compliance with this Standard was not affected by the change.

#### **Standard 7: governance**

- 7.1 The RCT advised that sonographers will fit within the RCT's existing governance structures. The RCT's register is managed by its Management Board, which is chaired by the Registrar and includes two lay members.
- 7.2 The Management Board oversees the assessment and approval of applications to join the register following the recommendations of independent assessors for each scope of practice. The RCT advised that it would sign a Memorandum of Understanding with the SoR to ensure assessors are available to assess sonographer applications to the RCT's register.
- 7.3 The Authority sought to understand how the RCT governance would retain expertise of sonography within its governance structure and include this within its decision making, following transfer of practitioners from the PVRs. The RCT had advised that this could be maintained through potential election of sonographers to its Management Board and communication with its independent assessors. Additionally, the core standards for sonographers, as with RCT's other scopes of practice, would be in line with Good Scientific Practice, which 'sets out the principles and values on which good practice undertaken by the Healthcare Science workforce is founded'.
- 7.4 The Authority considered it was not explicitly clear how the RCT would ensure awareness of occupation-led changes to sonography, such as within the CASE Standards, and reflected within its scopes of practice where necessary. The Authority noted it did not appear that assessors' roles included advising RCT of changes to standards. The Authority issued a Recommendation for the RCT to assure it had mechanisms to maintain up to date knowledge of good practice within sonography (Recommendation Two)

- 7.5 The Authority would, as part of its regular assessments, check that sufficient information was provided on the register website regarding: sonographer's addition to the register, the role of sonographers, education requirements and further information for the benefit of service users, the public, and registrants.
- 7.6 The Authority found that compliance with this Standard was not affected by the change.

### Standard 8: setting standards for registrants

- 8.1 The RCT advised that at point of entry to the register, PVRS and future registrants will be required to meet its standards, abide by the RCT Code of Conduct and meet its CPD requirements.
- 8.2 The Authority had previously sought assurance that transfers of registrants from one register to another (without requiring full application processes) ensured that 'grandfathered' registrants met the standards of the new register. The Authority sought to understand how the RCT assured that present standards of entry to the PVRS were equivalent to the RCT Scopes of Practice.
- 8.3 The RCT advised that its 'task and finish group', comprised of RCT and PVRS representatives, had mapped across the entry standards to ensure consistency' and highlighted the shared, explicit, requirement for applicants to meet the CASE standards (as discussed under Standard 9).
- 8.4 The Authority found that compliance with this Standard was not affected by the change.

### Standard 9: education and training

- 9.1 The RCT advised that sonographer registrants 'will hold as a minimum qualifications equivalent to a postgraduate certificate or diploma in medical ultrasound, BSc (Hons) medical ultrasound or an honours degree apprenticeship in clinical ultrasound that has been accredited by the [Consortium for the Accreditation of Sonographic Education \(CASE\)](#).'
- 9.2 CASE's role is to 'accredit high quality training programmes and focused courses that promote best ultrasound practice and ensure that ultrasound practitioners are safe and competent to practise, whilst taking into account informed views of service needs.' CASE is composed of member organisations including IPEM.
- 9.3 CASE publishes its list of accredited university training and postgraduate focused courses in its [course directory](#).
- 9.4 The Authority asked RCT to advise if alternate forms of qualification, or equivalence routes, would be accepted for entry to the register. The RCT responded that anyone without the above qualifications would be required to apply under the RCT's existing equivalence routes. The RCT was developing criteria and documentation to support this process prior to the 2021 transfer.
- 9.5 The RCT provided its Equivalence Criteria and FAQs for sonographer applicants. The Authority noted these required applicants to hold qualifications that met the CASE Standards.

- 9.6 The RCT makes education and training standards explicit and accessible to the public through its [Education and training](#) webpage and on related sections of the register website. The RCT confirmed that equivalent information for sonographers would be provided on its website. The Authority would check this in due course.
- 9.7 The Authority found that compliance with this Standard was not affected by the change.

#### **Standard 10: management of the register**

- 10.1 The RCT intends to take over operation of the PVRS after 1 March 2021. This is the renewal date for PVRS registrants at which point they will be required to confirm they meet and will continue to meet the RCT's standards of registration.
- 10.2 The Authority found that compliance with this Standard was not affected by the change.

#### **Standard 11: complaints and concerns handling**

- 11.1 Sonographer registrants will be subject to the same codes and disciplinary processes as other RCT registrants.
- 11.2 The Authority found that compliance with this Standard was not affected by the change.

#### **Share your experience**

- 12.1 The Accreditation team received one response from its invitation to share experience of the RCT. The response from the Registration Council for Clinical Physiologists (RCCP) provided its support for the RCT's application.

#### **Impact assessment**

- 13.1 The RCT had advised that if the application were not approved there would be a risk of sonographers becoming an unregistered profession. If approved, then employers and the public could be assured of practitioners on an Accredited Register.
- 13.2 The Authority noted and took account of the impact of its decision to approve the change.

#### **Equality duty under the Equality Act 2010**

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the notification of change.