

## Accredited Registers

### Condition Review: The Register of Clinical Technologists (RCT)

Date: July 2025

#### 1. Outcome

- 1.1 At the Register of Clinical Technologists (RCT) full renewal assessment<sup>1</sup>, the Professional Standards Authority ('we') issued nine Conditions on its accreditation, which were due to be completed by 31 January 2025.
- 1.2 We undertook an assessment of actions taken by the RCT to meet these conditions by 31 January 2025, and found that while they had met some, five conditions remained outstanding and were subsequently reissued. Of those, Condition Eight was re-issued with a three-month deadline. For chronology, this condition was re-named as Condition Five and will subsequently be referred to as Condition Five throughout this report. The RCT had three months to complete this condition.
- 1.3 This report sets out actions taken by the RCT to satisfy the Condition.
- 1.4 We found that the RCT had met Condition Five.

#### 2. Background

- 2.1 We assess registers against our *Standards for Accredited Registers* ('the Standards')<sup>2</sup>. Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.
- 2.2 When we assessed if the RCT had completed actions to meet conditions which were issued at their full renewal assessment, we found that five Conditions remained outstanding. Condition Five was reissued with a three-month deadline.  
**Condition Five:** The RCT should develop a proactive approach to working with employers, service users and other stakeholders. This should include sharing information about risks arising from the practices of clinical technologists and sonographers, and concerns about registrants, with the systems regulators and employers.
- 2.3 This report discusses the actions the RCT took to address the Condition, as well as our decision about whether the Condition is met. The RCT's responses to the remaining Conditions will be considered in due course.
- 2.4 We reviewed the following evidence:
  - a) RCT's reported actions about what it had done to meet Condition Five

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<https://www.professionalstandards.org.uk/sites/default/files/attachments/Accreditation%20renewal%20report%20-%20Standards%20-8%20Register%20of%20Clinical%20Technologists%20May%202024.pdf>

<sup>2</sup> <https://www.professionalstandards.org.uk/publications/standards-accredited-registers>

b) A review of the RCT's website

### **3. Concerns leading to the Condition**

- 3.1 During our 2024, full renewal assessment, we found that the RCT did not have a systematic approach to sharing information relating to the risks arising from the practice of clinical technologists and sonographers nor about the Fitness to Practise of registrants. Since registration with the RCT is a key mitigation for risks for unregulated roles, such as sonographers, we thought it was important for the RCT to work with the systems regulators and employers in the health sector, so that swift action can be taken when concerns arise. We considered that this may be achieved by establishing protocols, and/or engagement with these stakeholders to a greater extent. The RCT also did not actively engage with registrants or service users to get input into its work, in line with our minimum requirements. Given this, the above condition was imposed with a 12-month timeframe.
- 3.2 At the 12-month review, the RCT told us that they agreed with IPEM (who are one of the professional bodies partnering to run the RCT), to run a campaign promoting the purpose and value of professional registration in protection of the public and promoting professionalism. The RCT also reported they had developed an action plan for engagement with employers, service users and other stakeholders such as NHS Employers, and recruiting Heads of Departments, and anticipated this would be completed shortly after the review period.
- 3.3 While the Accreditation Panel acknowledged this information, they ultimately considered that in the absence of any formal or documented information to substantiate these claims, the condition could not be considered met. Given the RCT reported they would shortly be producing an action plan, the Accreditation Panel re-issued with condition with a three-month deadline.
- 3.4 Further details can be found under the RCT's Condition Review Report<sup>3</sup>.

### **4. Assessment of Condition Five**

- 4.1 The RCT submitted their response to Condition Five on 6 June 2025. We sought a further response from them, and they provided an update on 23 June 2025.
- 4.2 In providing their response to the Condition, the RCT provided us with a copy of their Engagement Plan and told us about their plans to continue campaigning for statutory regulation.
- 4.3 The RCT reported to us that the IPEM is carrying out ongoing activities to advocate for a move to statutory registration of all Clinical Technologists. They are working with a number of other organisations to promote this and believe registration (with the RCT) to be extremely valuable in ensuring and enhancing professional standards and accountability, and thereby patient safety and quality of care. As a part of this work, the RCT included a section advocating for

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<sup>3</sup> [Condition Review Report RCT March 2025.pdf](#)

statutory regulation in their Manifesto for the Future of Medical Physics and Clinical Engineering<sup>4</sup>. This is available on their website.

- 4.4 We followed up with the RCT, to confirm if they considered unregistered practitioners to be their biggest risk, given the majority of their risk mitigation strategies are targeted at this. The RCT confirmed that they believe that unregistered practitioners are a major risk to the profession and explained that is why the majority of their work is aimed at advocating for registration with the RCT and advocating for statutory regulation. Registration ensures that all clinical technologists meet uniform standards, have consistency in training, competence and ethical standards and protects patients from harm by preventing unqualified individuals from performing high-risk procedures.
- 4.5 In assessing the RCT's engagement plan, we noted that majority of the activities appeared to be marketing/ communications activities targeted at RCT registrants. In considering the environment in which Clinical Technologists work (i.e. mainly in secondary care NHS settings), we are satisfied that the RCT's approach to information sharing meets the requirements of the condition at a high level. The RCT told us that their Registrar Update is circulated to all current RCT registrants and current applicants. The RCT has encouraged their registrants to share this information with their employers to disseminate the information easily and accurately (given RCT registrants are not required to keep their employment details updated with the RCT). We also acknowledge that the RCT has a number of marketing and engagement campaigns planned for 2025-2026 which all are addressed at raising awareness of the RCT, promoting RCT registration and advocating for statutory registration. Given that the RCT consider these actions to be their main risk mitigation strategy of registration practice, we are satisfied their ongoing and planned activities are a proactive way of managing risk.
- 4.6 In responding to our Condition, the RCT not only provided their Engagement Plan but also detailed IPEM's ongoing campaign for universal statutory registration—advocated in the publicly available Manifesto for the Future of Medical Physics and Clinical Engineering. By identifying unregistered practitioners as their greatest risk, they have focused their mitigation strategy on driving RCT membership and securing statutory regulation, measures that standardise training, competence and ethics while preventing unqualified individuals from performing high-risk procedures. Although most activities in the Engagement Plan centre on registrant-facing communications rather than direct employer outreach, the RCT's operational context—where registrants largely work within NHS secondary care—combined with its regular Registrar Updates (and encouragement for registrants to share these with employers), plus a suite of 2025–26 marketing and advocacy campaigns, collectively demonstrate a proactive, risk-focused approach to information-sharing that fulfils the condition's requirements.

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<sup>4</sup> [IPEM Launches MPCE Manifesto for the Next Government - IPEM](#)

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## **5. Conclusion**

- 5.1 The RCT response following the submission of further evidence has demonstrated that the organisation is effectively engaging with relevant stakeholders. This is happening in the context of the strategic objective to eventually achieve statutory regulation of clinical technology, but is also relevant to the current system of voluntary registration. As a result, the condition is met and the standard also.
- 5.2 We therefore found that Condition Five has been met.