

Education and Training Committee, 25 September 2008

Amendment to the standards of proficiency for radiographers –
consultation responses

Executive summary and recommendations

Introduction

A consultation was held between April and August 2008 on a proposed amendment to the standards of proficiency for radiographers.

The attached document summarises the consultation responses.

Decision

The Committee is invited to agree and recommend to Council:

- the text of the attached consultation responses document; and
- the text of the amended standard on page four.

Background information

The consultation document is available on the HPC website:
www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=68

Resource implications

- Laying out and re-publication of radiographers standards of proficiency (at next print run).

Financial implications

- Laying out and re-publication of radiographers standards of proficiency (at next print run).

Appendices

None

Date of paper

15 September 2008

**Amendment to the standards of proficiency for radiographers
Consultation responses**

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Introduction

We consulted between 28 April 2008 and 1 August 2008 on a proposed amendment to the standards of proficiency for radiographers.

Standards of proficiency

The standards of proficiency are threshold standards for the safe and effective practice of each of the professions we regulate. Their primary role is as standards for entry to the Register. They describe the minimum skills and knowledge necessary to become registered.

We visit education providers to ensure that they meet our standards of education and training and that their programmes allow their students to meet the standards of proficiency. Once a programme is approved, someone successfully completing that programme is eligible to apply for registration.

Our proposal

A profession-specific standard in standard 2b.4 for diagnostic radiographers reads:

- be able to assist with ultrasound imaging procedures and perform standard first trimester ultrasound measurements

We consulted on a proposal that this standard should be amended to read:

- be able to assist with ultrasound imaging procedures

This proposal was made in light of feedback which suggested that this standard does not reflect current practice and is not appropriate as a requirement for threshold safe and effective practice at this time. The feedback received also suggested that education providers would be able to meet the first part of the standard but that the second part of the standard relates to emerging practice only and that insufficient numbers of clinical placements exist in pre-registration education and training to allow this standard to be met.

Analysing your responses

Now that the consultation has ended, we have analysed all the responses we received.

We carefully considered each response we received, taking into account whether similar comments were made by other respondents.

The structure of this document

In this document, we summarise the comments we received in response to the consultation, and then explain our comments in response.

Amendments to other publications

Once the text of the standards is finalised, we will make corresponding changes to any publications which quote the standards, if changed.

Consultation responses

We received seventeen responses to the consultation; six from organisations and eleven from individuals. Most of the individuals who responded were staff working on radiography or ultrasonography programmes.

Twelve respondents to the consultation agreed with our proposed change; five respondents disagreed. The responses we received are summarised below.

In agreement

Those respondents who agreed with our proposed amendment argued that the current standard was not necessary for safe and effective practice and that current operational arrangements in pre-registration education and in practice meant that this standard could not be met.

The Society and College of Radiographers, the United Kingdom Association of Sonographers, NHS Education for Scotland, the Board of Community Health Councils in Wales and the British Association for Counselling and Psychotherapy all said they supported the change.

Amongst education providers, Cardiff University Department of Radiography said that they agreed with the proposed amendment and said that it was necessary to ensure that undergraduates were provided with appropriate clinical experience. A lecturer outlined a pilot to train undergraduates in performing obstetric ultrasound first trimester scans. The lecturer concluded that the current standard was not necessary for safe and effective practice and said that 'including this aspect is likely to compromise competence in the other radiographic standards'.

Two respondents expressed surprise at the inclusion of this standard in the first place. One respondent said that radiographers should have an understanding of the principles and theory of ultrasound examinations but that the ability to conduct first trimester examinations 'has never been a part of Radiographer training and should never be so'. Another respondent said: 'Ultrasound departments are also already heavily involved with training sonographers and specialist registrars and have little spare capacity for the time it would take to train at primary radiography degree level.' They concluded that 'first trimester ultrasound should not and must not be a mandatory requirement'.

In disagreement

Five respondents disagreed with the proposal, arguing that both parts of the standard were unnecessary, in particular questioning why it was specifically necessary to mention ultrasound as opposed to other diagnostic interventions.

One respondent said that they believed that the proposed revised standard was unnecessary for safe and effective practice. They argued that assisting with ultrasound examinations is something that a number of radiographers will do, but that it would be dependent upon their employer. They further added: 'I believe that a newly qualified radiographer should be able to perform radiographic duties to the highest standard and if too many additions are added, such as this, the burden on the student, universities and ultrasound departments will increase and

possibly compromise the time spent learning the basic skills needed to be a competent radiographer.'

Another respondent said that they questioned why assisting with ultrasound examinations should be formally stated in the standards of proficiency, and expressed concern that if this standard was added other, similarly specific and detailed standards would need to be added. These comments were echoed by another respondent, who was also concerned that the standard would 'belittle' other radiography skills. They said: 'Qualified radiographers should be able to assist in any imaging examinations e.g. arteriography so why would a specific mention need to be made for ultrasound[?]' An ultrasonographer argued that they believed that the standard and proposed standard represented an attempt to 'lower standards' because performing any ultrasound examination requires specific post-graduate level training.

Our comments

The majority of respondents, including two professional organisations in the field, agreed with the proposed change to the standards. All respondents agreed that 'be able to...perform standard first trimester ultrasound measurements' was not at threshold level and should be removed from the standards. We have decided to remove this part of the standard accordingly.

The wording 'be able to assist' is consistent with other existing standards for diagnostic radiographers. For example, 'be able to manage and assist with fluoroscopic and complex contrast agent procedures' and 'be able to assist with standard magnetic resonance imaging' both appear in the existing standards.

As part of considering whether a standard is necessary for safe and effective practice, we also need to ensure that the standard does not act as an undue barrier to education providers. Most respondents agreed that whilst the standard as it currently read could not easily be met because of other pressures, the amended standard could be met as this was already addressed as part of pre-registration education and training.

Having carefully considered all the comments we received, we have decided that the amended standard will read:

'be able to assist with ultrasound imaging procedures'

The change to this standard will be effective immediately.

List of respondents

Below is a list of those who provided responses to the consultation. Where a response has been made on behalf of an organisation we have given the name of the organisation in the text. Where the response comes from an individual we have not.

We received seventeen responses to the consultation; six from organisations and eleven from individuals.

We would like to thank all those who responded for their comments.

Board of Community Health Councils in Wales
British Association for Counselling and Psychotherapy
Cardiff University, Department of Radiography
NHS Education for Scotland
Society and College of Radiographers
United Kingdom Association of Sonographers

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