



Ag Rialáil Gairmithe Sláinte  
agus Cúraim Shóisialaigh

Regulating Health +  
Social Care Professionals

# Public Consultation Report

Radiographers Registration Board

Code of Professional Conduct & Ethics Bye-Law

October 2013



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## Introduction

### About the Radiographers Registration Board

The Radiographers Registration Board has statutory responsibility for the registration of members of the profession; approval and monitoring of education and training programmes; establishing the code of professional conduct and ethics and standards of performance to which Radiographers and Radiation Therapists must adhere and recognition of qualifications gained outside the State.

### About CORU

CORU is responsible for regulating health and social care professions. It comprises the Health and Social Care Professionals Council and the registration boards established under the Health and Social Care Professionals Act 2005 (as amended). CORU's role is to protect the public by promoting high standards of professional conduct, professional education, training and competence amongst the designated professions. The designated professions under the Act are social workers, clinical biochemists, dietitians, medical scientists, occupational therapists, orthoptists, physiotherapists, podiatrists, psychologists, radiographers, social care workers and speech and language therapists.

## The Public Consultation Process

### Background

In March 2013 CORU launched a public consultation seeking feedback on Radiographers Registration Board Code of Professional Conduct and Ethics Bye-Law 2013

### Code of Professional Conduct and Ethics Bye-Law 2013

In accordance with Section 31 of the Health and Social Care Professionals Act 2005 (as amended)

31. (2) A code of professional conduct and ethics adopted by the registration board of a designated profession must specify the standards of conduct, performance and ethics expected of registrants of that profession; and

In accordance with Section 50 of the Health and Social Care professionals Act 2005 (as amended)



50. “ ‘professional misconduct’, in relation to a registrant of a designated profession, means any act, omission or pattern of conduct of the registrant that – (a) is a breach of the code of professional conduct and ethics adopted by the registration board of that profession...”

Section 31 (1)(i) of the Health and Social Care Professionals Act 2005 (as amended) empowers the Board to make a bye-law to adopt a code of professional conduct and ethics which sets out the standards of conduct, performance and ethics expected of registrants of that profession.

### Publicising the Consultation Process

A public consultation on the draft bye-law was held between March 28 and May 9 2013. A number of channels were used to publicise the consultation process and invite the submission of observations. These included:

- An advertisement was placed in the Irish Independent on Friday, 29 March (see appendix one).
- A press release was placed on [www.coru.ie](http://www.coru.ie) (See appendix two for a copy of the press release).
- An online feedback form was developed and the link, along with an explanation of the consultation, was emailed to all contacts in the CORU database related to Radiography and Radiation Therapy, including the Professional Bodies, Trade Unions, Educators, Hospitals, DoH contacts, DoCYA contacts, Service users, National regulatory bodies, Council and registration Boards and other interested parties and individuals who have previously corresponded with CORU. Over 1,300 direct contacts were made.
- Information on the consultation along with a link to the online feedback form was hosted on the CORU website.

People were invited to participate in the consultation process in a number of ways:

- They could ring CORU to request a copy of the draft bye-law and to offer feedback
- They could visit CORU's office to view the draft bye-law and give their feedback in person.
- They could visit [www.coru.ie](http://www.coru.ie) and choose to complete an online feedback form, to print a copy of the form and post it, or email it to CORU.
- They could email submissions to [consultation@coru.ie](mailto:consultation@coru.ie)



## Overview of responses to consultation

There were 15 responses to the public consultation:

Online survey	12
Email submissions	3
Postal submissions	0
Telephone	0

### Online Feedback Form

Respondents were asked to identify if they were offering feedback on their own behalf or on behalf of an organisation.

Individual	8
Professional Organisation	7
Unknown	0

Submissions were received on behalf of the following professional organisations:

- Irish Society of Chartered Physiotherapists
- Irish College of Ophthalmology
- Irish College of Physicists in Medicine
- School of Medicine & Medical Science, University College Dublin
- HSE (St Luke's Kilkenny)
- Irish Institute of Radiography and Radiation Therapy
- Irish College of Ophthalmologists



## Issues emerging from the consultation process

The report highlights the key issues that emerged from the consultation process. They include:

1. Medically significant findings
2. Social Media
3. Report serious breaches (self, others)
4. Informed consent
5. Prescriber issues
6. Research Ethics

The report presents the key findings from the consultation process followed by the decisions made in relation to the findings by the Radiographers Registration Board and a brief rationale for each decision.

## Issues emerging from the consultation process

### 1. Medically significant findings

Respondents referred to the use of the word “report” in the draft Bye-Law with regard to medically significant findings. It was submitted that the professional will often highlight pathology but are not expected to pick up all “medially significant findings”. It was suggested that the word “communicate” would be more appropriate in this instance.

#### **Decision**

The Radiographers Registration Board considered the submissions on this item and agreed to amend the Bye-Law to use the word “communicate” instead of “report”.

### 2. Social Media

Respondents referred to this item in the online survey. The Radiographers Registration Board specifically asked participants in the consultation to consider if a specific clause should be contained in the Bye-Law regarding Social Media. All respondents were in favour of the inclusion of a Social Media specific provision.

#### **Decision**



The Radiographers Registration Board decided to amend Section 3 of the Bye-Law to specifically to include the following wording: “Registrants must be conscious of their need to use social media and social networking in a responsible way, in particular, to avoid any breach of their obligations in this Code such as Confidentiality under Clause 3 or Use of Records and information under Clause 16.”

### **3. Report serious breaches (self, others)**

Respondents had raised a query regarding provision 5c of the Code in relation to the requirement to report breaches of behavior and malpractice. It was communicated in the consultation that this provision was not clear regarding whether it applied to the registrant themselves or other registrants.

#### **Decision**

The Radiographers Registration Board reviewed the submissions on this matter. The Board decided to amend the Bye-Law and revised provision 5c to read “report any serious breaches of behaviour or malpractice by yourself or others”.

### **4. Informed Consent**

Respondents raised concerns in relation to the clarity of provision 10 regarding the duties and obligations of Radiation Therapists regarding obtaining written informed consent.

#### **Decision**

The Radiographers Registration Board decided to make amendments to ensure clarity on these standards as follows:

- obtain consent or ensure consent has been obtained as appropriate.
- make reasonable efforts to encourage the patient to go ahead with treatment or examination that is justified and in their best interest.

### **5. Prescriber/Practitioner issues**

Respondents raised a query regarding the use of the words prescriber and practitioner in provision 8.

#### **Decision**



The Radiographers Registration Board reviewed the comments made and decided to amend the wording of 8c by replacing the word “practitioner” with the words “registrant of the profession”. 8e was amended by replacing the words “another health or social care professional” with the word “prescriber”

## 6. Research Ethics

The submissions on provision 22 related to which items should be grouped under the “you must” section and what items should be grouped under the “you should” section.

### Decision

The Board considered the full provision again in light of the submissions and made amendments which grouped the following two items under “You Should”: a. take part in research or support the research of others, b. disseminates or circulate the research findings widely to further the evidence base of the profession and to improve patient examination and treatment. The remaining items were grouped under “You Must”.

### Conclusion

The Radiographers Registration Board considered all submissions in detail. The Board made amendments to the Bye-Law as detailed in the decisions above.

### Acknowledgements

CORU would like to extend our appreciation and thanks to all those that participated in the consultation process.



## Appendix 1: Press release

### **Radiographers Registration Board Launches Public Consultation on Bye-Laws**

**Thursday 28 March 2013:** The Radiographers Registration Board, which has statutory responsibility for the registration of radiographers and radiation therapists, has today launched a [public consultation process on three bye-laws that will guide the future regulation of the profession.](#)

The three bye-laws upon which views are sought relate to:

- Code of Professional Conduct and Ethics
- Application for Registration
- Approved Qualifications and Divisions of the Register

These bye-laws will form the foundation pillars upon which the framework for the regulation of radiographers and radiation therapists will be developed.

Launching the public consultations, Ms Ginny Hanrahan, Registrar, commented that: “It is critical that members of the profession participate in these consultations so they can help shape the new regulatory environment for their profession.”

Ms. Hanrahan continued: “Regulation is ultimately about protecting patients and therefore we are also very interested to hear the views of the public more generally”.

Each of the bye-laws can be viewed on [www.coru.ie](http://www.coru.ie) or can be requested by emailing [consultation@coru.ie](mailto:consultation@coru.ie) or contacting CORU on 01 2933160.

Feedback can be provided by filling in feedback forms on [www.coru.ie](http://www.coru.ie) by emailing [consultation@coru.ie](mailto:consultation@coru.ie), or in writing to Public Consultation, CORU, 13 - 15 The Mall, Beacon Court, Bracken Rd., Sandyford, Dublin 18.



The consultation process will close at 12 noon on Thursday 9 May 2013 Any submissions received after this time will not be considered.

ENDS

## Appendix 2: Copy of Advertisement

Irish Independent 29 March 2013

 **Ag Rialáil Bainneithe Sláinte agus Cúraim Shóisriataigh**  
**Regulating Health and Social Care Professionals**

## Public Consultation

The Radiographers Registration Board wants to hear the views of the public, the profession and other interested parties on:

1. Application for Registration Bye-Law 2013
2. Code of Professional Conduct and Ethics Bye-Law 2013
3. Approved Qualifications and Divisions of the Register Bye-Law 2013

Further information on the consultation can be found on [www.coru.ie](http://www.coru.ie)

**The closing date for receipt of comments and submissions is 12 noon on Thursday May 9 2013.**

Submissions received after this time and date will not be considered.



### Appendix 3: Copy of Online Feedback Form

#### **Public Consultation on Bye-Law governing Code of Professional Conduct and Ethics for Radiographers and Radiation Therapists**

Thank you for taking the time to participate in CORU's consultation process on a Bye-Law governing the Draft Code of Professional Conduct and Ethics for Radiographers and Radiation Therapists. This feedback form will take approximately ten minutes to complete.

We are currently developing a system of statutory registration for health and social care professionals. The purpose of this regulation is to protect the public.

The Code of Professional Conduct and Ethics for Radiographers and Radiation Therapists has been drafted using the framework code developed by the Health and Social Care Professionals's Council at CORU . The Radiographers Registration Board, consisting of both lay members and representatives of the profession, have carefully and thoughtfully adapted the framework with additional assistance from experts external to the Board and international best practice

The Code specifies the standards of conduct, performance and ethics expected of registered radiographers and radiation therapists and it is intended to reflect the needs of patients and the standards they can expect when interacting with the practice of radiography and radiation therapy. Failure to meet the standards specified in the Code could result in a complaint of professional misconduct being made about the registrant.

If you have any queries about the consultation process or completing the survey, please contact CORU on 01 2933160 or email [consultation@coru.ie](mailto:consultation@coru.ie).



The closing date for receipt of submissions is 12:00pm on Thursday 9 May 2013. Any submissions received after that date will not be considered. We want to hear the views of the public and the profession and by participating in this consultation process you are helping to shape how radiographers and radiation therapists are regulated.

Yours faithfully,  
Ginny Hanrahan  
Registrar

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**Contact Details:**

You do not need to provide this information but please do if you would like us to provide you with details on the outcome of this consultation process.

First Name: \_\_\_\_\_

Surname: \_\_\_\_\_

Email \_\_\_\_\_

Telephone Number \_\_\_\_\_

Would you like to be added to our database so we can contact you regarding future developments? Please say YES or NO

\_\_\_\_\_

**Are you contributing to this survey in  
(please tick one)**

a personal capacity? \_\_\_\_\_

on behalf of an organisation? \_\_\_\_\_

If on behalf of an organisation, please specify): \_\_\_\_\_

**How did you hear about this consultation?  
(please tick as many as apply)**

Advertisement in a newspaper \_\_\_\_\_

Article in a publication \_\_\_\_\_

On [www.coru.ie](http://www.coru.ie) \_\_\_\_\_

On another website \_\_\_\_\_

By email \_\_\_\_\_

Other (please specify) \_\_\_\_\_



**Question 1:** Is the language used and the layout of the Code clear and easy to follow and understand?

Yes \_\_\_\_\_

No \_\_\_\_\_

Please provide any comments you have on the language and layout of the draft Code:

**Question 2:**

Does the Code reflect the needs of patients?

Yes \_\_\_\_\_

No \_\_\_\_\_

Please provide any comments here

**Question 3**

Does the Code reflect the standards that patients can expect when dealing with the practice of radiography and radiation therapy?

Yes \_\_\_\_\_

No \_\_\_\_\_

Please provide any comments here:



**Question 4 – Conduct (sections 1 to 5)**

Are there any additional points that should be included?

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes please provide details quoting the section reference

**Question 5– Conduct (sections 1 to 5)**

Are there any points that should be excluded?

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes please provide details quoting the section reference

**Question 6 – Performance (sections 6 to 18)**

Are there any additional points that should be included?

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes please provide details quoting the section reference

**Question 7 – Performance (sections 6 to 18)**

Are there any points that should be excluded?

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes please provide details quoting the section reference



**Question 8 – Ethics (sections 19 to 23)**

Are there any additional points that should be included?

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes please provide details quoting the section reference

**Question 9 – Performance (sections 6 to 18)**

Are there any points that should be excluded?

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes please provide details quoting the section reference

**Question 10 – Appendix A – suggested procedure for ethical decision-making**

Do you believe that Appendix A – suggested procedure for ethical decision-making will assist radiographers and radiation therapist in their practice?

Yes \_\_\_\_\_

No \_\_\_\_\_

Please provide any comments here

Thank you for participating in this consultation process. Your views will be taken into consideration. If you have provided your contact details you will be contacted with details on the outcome of this process.

If you have any queries please contact CORU on 01 2933160 or email

[consultation@coru.ie](mailto:consultation@coru.ie) .



**Appendix 4: Copy of Draft Bye-law**

**S.I. No.                      of 2012**

**RADIOGRAPHERS REGISTRATION BOARD CODE OF PROFESSIONAL  
CONDUCT AND ETHICS BYE-LAW 2012**

The Radiographers Registration Board, in exercise of the powers conferred in it by section 31 of the Health and Social Care Professionals Act 2005, with the approval of the Health and Social Care Professionals Council, hereby makes the following bye-law:

1. This bye-law may be cited as the Radiographers Registration Board Code of Professional Conduct and Ethics bye-law 2012.
2. The Radiographers Registration Board hereby adopts its Code of Professional Conduct and Ethics contained in the schedule to this bye-law.
3. The Radiographers Registration Board Code of Professional Conduct and Ethics forms part of this bye-law.
4. This bye-law comes into operation on \_\_\_\_\_ 2012 and both the bye-law and the Radiographers Registration Board Code of Professional Conduct and Ethics remain effective until revised by further bye-law of the Radiographers Registration Board.