



Ag Rialáil Gairmithe Sláinte  
agus Cúraim Shóisialaigh

Regulating Health +  
Social Care Professionals

# Regulatory Impact Assessment

## *Revised Standards of Proficiency and Criteria for Education and Training Programmes (Radiographers and Radiation Therapists)*

May 2024

## [1] Summary of Regulatory Impact Assessment

<b>Organisation</b>	CORU – Health and Social Care Professionals Council
<b>Registration Board</b>	Radiographers Registration Board
<b>Regulatory Intervention</b>	Revision of Pre-Registration Education and Training Requirements for Radiographers and Radiation Therapists: <ul style="list-style-type: none"> <li>• <i>Standards of Proficiency for Radiographers</i></li> <li>• <i>Criteria for Education and Training Programmes (Radiographers)</i></li> <li>• <i>Standards of Proficiency for Radiation Therapists</i></li> <li>• <i>Criteria for Education and Training Programmes (Radiation Therapists)</i></li> </ul>
<b>Relevant Legislation</b>	Health and Social Care Professionals Act 2005 (as amended)
<b>Date of Assessment</b>	May 2024
<b>Stage</b>	Post-Public Stakeholder Consultation
<b>Associated Documentation</b>	Copies of all consultation materials are available online: <ul style="list-style-type: none"> <li>• <a href="#">Radiographers</a></li> <li>• <a href="#">Radiation Therapists</a></li> </ul>
<b>Contact</b>	Strategy and Policy Unit: <a href="mailto:strategyandpolicy@coru.ie">strategyandpolicy@coru.ie</a>

### *Regulatory Intervention Objectives*

The revision of the Radiographers Registration Board's *Standards of Proficiency* and *Criteria for Education and Training Programmes* for the two professions of Radiographers and Radiation Therapists provides for the updating of the pre-registration education and training requirements for both professions, taking into account of any changes in the threshold practice of the professions in Ireland since their establishment by the Board in 2013.

In addition, this revision process allows for the adoption by the Board of the Health and Social Care Professionals Council 2015 revised *Framework Standards of Proficiency* and *Criteria for Education and Training Programmes* and consideration of developments in the design of education and training programmes, particularly the movement towards articulating learning at programme and module levels in terms of learning outcomes.

This revision process – that includes the review of international comparator pre-registration education and training requirements with the aim of identifying developments in threshold standards and evaluation of these in the context of practice of the professions in Ireland – will allow for the articulation of threshold requirements appropriate to contemporaneous threshold practice and will streamline the requirements, improving the understandability and applicability by key users of the *Standards of Proficiency* and *Criteria for Education and Training Programmes*.

**It is important to note that this revision process does not introduce a new form of regulatory intervention. Rather, it reviews and updates the currently established regulatory intervention as designed under Section 48(2) of the *Health and Social Care Professionals Act 2005 (as amended)*.**

### Regulatory Intervention Options

The Radiographers Registration had two options:

1. Make no amendments to its current pre-registration education and training requirements – maintain the status quo
2. Review and update its pre-registration education and training requirements

**Preferred Option:** *Review and update its pre-registration education and training requirements*

The Radiographers Registration Board concluded that in order to continue to meet the needs of both professions and in particular, to address the continuing changes in the delivery of education and training programmes, and to continue to deliver its statutory object of ensuring public protection through the approval and monitoring of education and training programmes and recognition of international qualifications, it was necessary to undertake a detailed review of its *Standards of Proficiency and Criteria for Education and Training Programmes*.

Options		
Option One: No Amendments to Pre-Registration Education and Training Requirements		
Costs	Benefits	Impacts
No additional cost	No benefits identified	While the existing pre-registration education and training requirements would continue to set the threshold level for entry into practice for both professions, they may not reflect emerging developments in the practice of the professions or reflect the changing delivery of education and training programmes at the time the standards were first set.
Option Two: Review and Update Pre-Registration Education and Training Requirements		
Costs	Benefits	Impacts
No additional cost	Reviewing pre-registration education and training requirements will: <ul style="list-style-type: none"> <li>• Identify any emerging trends in pre-registration education and training, allowing for requirements to be updated to reflect developments in the profession, to ensure public</li> </ul>	The revision and updating of the pre-registration education and training requirements for both professions will not alter the nature of the regulatory intervention required by the <i>Health and Social Care Professionals Act 2005 (as</i>

	<p>protection.</p> <ul style="list-style-type: none"> <li>Streamline requirements, improving clarity of requirements by stakeholders and greater ease of use by education providers and in applying to regulatory activity.</li> </ul>	<p><i>amended</i>).</p> <p>Having completed both the evaluation of international comparator threshold level requirements and a detailed public stakeholder consultation process, no significant errors, gaps or omissions in the Board's requirements were identified. In the main, the only amendments to the <i>Standards</i> and <i>Criteria</i> documents for both professions were in terms of the articulation of the threshold requirements, rather than the substance or content of the requirement itself.</p> <p>These changes will provide greater clarity and usability of the Board's pre-registration education and training requirements.</p>
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## [2] Statement of Regulatory Intervention Context and Objectives

Under the *Health and Social Care Professions Act 2005 (as amended)*, CORU's role is to protect the public by promoting high standards of professional conduct, education, training and competence through statutory registration of health and social care professionals. CORU is comprised of the Health and Social Care Professionals Council and the Registration Boards, one for each profession named in the Act.

Each Registration Boards is responsible for:

- establishing and maintaining a register of members of the profession;
- approving and monitoring education and training programmes for entry to the register;
- recognising qualifications gained outside the State; and
- setting the *Code of Professional Conduct and Ethics* giving guidance to professions on Continuing Professional Development (CPD).

Each Registration Board operates a qualifications-based register whereby applicants to a register, as detailed in Section 38(1)(c) of the legislation, are granted registration on the basis of holding an approved qualification in that profession. Each Registration Board establishes a list of approved qualifications that sit on an Approved Qualifications Bye-Law.

Applicants presenting with a qualification on this bye-law are eligible – subject to meeting all other fit and proper requirements – for registration.

In relation to the approval and monitoring of education and training programmes, Section 48(2) of the *Health and Social Care Professionals Act 2005 (as amended)* states that for this purpose a Registration Board, “[...] may issue guidelines concerning the requirements for its approval of education and training programmes.” To this end, each Registration Board sets **pre-registration education and training requirements** which all education programmes must meet in order to be approved – and maintain approval – from a Registration Board.

#### *What are Pre-Registration Education and Training Requirements?*

Pre-registration education and training requirements, set by a Registration Board, comprise of two documents:

- **Standards of Proficiency** that articulate the baseline knowledge, skills and professional behaviours that are required of all entrants to the register. The *Standards* are set at threshold level meaning they are set at the minimum, entry level of competence needed to enable an individual to practise autonomously and safely, and in so doing, protect the public.
- **Criteria for Education and Training Programmes** describe the design and management requirements that an education provider must meet in order to demonstrate that the programme can consistently produce graduates that meet the *Standards of Proficiency*.

The *Standards* and *Criteria* work together to ensure the training of future graduates prepares competent professionals who are ready for professional practice.

#### *How are the Standards and Criteria used?*

The *Standards*, in articulating the threshold level of knowledge, skills and professional behaviours, set the threshold requirements by which **all applicants** to the register as assessed against. Therefore, applicants who have completed an education and training programme that is awarded in Ireland **and** applicants who have achieved a qualification outside of Ireland must demonstrate achievement of all the standards as part of the registration process. In particular, education providers in Ireland that prepare students to practise the profession upon graduation – and seek approval for their programmes – use the standards to design their education and training programmes.

Similarly, the *Criteria* is used in the approval and monitoring of education programmes and two specific criteria concerning the level of qualification for entry to the register and the total number of practice placement hours completed before registration are used to assess international applicants.

This Regulatory Impact Assessment is concerned with the revision of pre-registration education and training requirements for the Radiographers and Radiation Therapists which are used in the following regulatory functions:

- Approval and monitoring of education and training programmes awarded in the Irish State; and
- Recognition of international applicants from outside the Irish State.

### *Review Objectives*

The Radiographers Registration Board made the decision in 2023 to undertake a review of its pre-registration education and training requirements. The Board undertook a detailed scoping and review exercise, examining comparator entry level standards of proficiency used internationally with the aim of identifying:

- any emerging trends in entry level standards across both professions since previous revision of the Board's requirements;
- any gaps or omissions in the Board's current standards; and
- any areas of ambiguity or lack of clarity in how the Board's requirements are articulated.

To this end, the Board reviewed the following international comparator threshold standards for entry to practice:

- **Health and Care Professions Council (UK):** Standards of Proficiency for Radiographers
- **Medical Radiation Practice Board (Australia):** Professional Capabilities for Medical Radiation Practitioners
- **European Federation of Radiographer Societies (ERFS):** European Qualifications Framework (EQF) Level 6 Benchmarking Document
- **American Society of Radiologic Technologists (ASRT):** Practice Standards for Medical Imaging and Radiation Therapy
- **Irish Institute of Radiographers and Radiation Therapists:** Scope of Practice for Graduate Diagnostic Radiographer and Scope of Practice for Graduate Radiation Therapist
- **International Institute of Radiographers and Radiological Technologists (ISRRT):** Guidelines for the Education of Entry Level Professional Practice in Medical Radiation Sciences

In revising its pre-registration education and training requirements, the Board considered the required threshold areas of knowledge and skill required for entry into both professions of Radiography and Radiation Therapy, considering both its currently published requirements, trends in international requirements and the specific practice of the professions in Ireland. To these considerations, it also considered how to refine and clarify the articulation of its requirements to ensure understandability among the key users of the documents.

In taking the decision to review and update its *Standards of Proficiency* and *Criteria for Education and Training Programmes*, the Board sought to:

- ensure the articulation of its pre-registration education and training requirements align with international best practice and are reflective of practice of the professions in Ireland to provide continue assurance of public protection; and
- ensure its pre-registration education and training requirements reflect the developments in curriculum and assessment design in professional education and training programmes.

### **[3] Public Consultation**

The Board prepared draft *Standards of Proficiency* and *Criteria for Education and Training Programmes* for both professions and issued these for a public consultation. The

consultation period launched on Monday, 16 October 2023 and closed on Friday, 10 November 2023. Two separate public consultation processes were undertaken simultaneously: one process concerned the *Standards and Criteria* for Radiographers, and a separate process concerned the *Standards and Criteria* for Radiation Therapists.

#### *Publicising the Consultation Process*

A number of channels were used to publicise the consultation process and invite the submission of observations:

- An advertisement was placed in The Irish Times and Seachtain newspapers on 19 and 25 October 2023.
- Information on the consultation was hosted on the CORU website.
- An online feedback form was developed and a link to this form was included in the public consultation notice on the CORU website.
- CORU social media platforms were utilised throughout the consultation period, including X (formerly Twitter) and LinkedIn.
- An email highlighting the consultation process was issued to an extensive range of stakeholders including education providers of approved programmes and the professional body.

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

- 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).
- They could submit written submissions to: Public Consultation, Strategy and Policy Unit, CORU, Infinity Building, George's Court, George's Lane, Smithfield, Dublin 7, D07 E98Y

#### *Consultation Responses*

Across both consultation processes – one for Radiographers and one for Radiation Therapists – a total of 84 responses were received.

Radiographers		Radiation Therapists	
Online Questionnaire	40	Online Questionnaire	40
Email Submissions	2	Email Submissions	2
<b>Total</b>	<b>42</b>	<b>Total</b>	<b>42</b>

Following the close of the consultation process, the Board reviewed all of the submissions received before finalising its revised *Standards of Proficiency and Criteria for Education and Training Programmes*.

In the main, the feedback provided did not identify any significant gaps, omissions or errors in the Board's pre-registration education and training requirements for either profession.

The qualitative feedback received suggested amendments to the articulation of a number of the standards of proficiency to aid clarity, understandability and application, while changes were proposed through the consultation process to the minimum number of practice placement hours for both professions, with feedback suggesting a reduction from 1200 hours to 1000 hours. Qualitative feedback from stakeholders provided a strong rationale that

achievement of the standards of proficiency – for both professions – could be delivered within 1000 hours of practice placement.

Detailed analysis of the consultation feedback is available in the Radiographers Registration Board’s *Public Consultation Reports* for Radiographers and Radiation Therapists: <https://coru.ie/public-protection/publications/consultation-reports/radiographers-registration-board/>

#### [4] Analysis of Costs, Benefits and Impacts

##### **Option One: No Amendments to Pre-Registration Education and Training Requirements**

<b>Costs</b>	No additional cost
<b>Benefits</b>	No benefits identified
<b>Impacts</b>	<p>The Radiographers Registration Board would retain its already approved pre-registration education and training requirements for both professions and these would remain the threshold standard for entry onto the professional registers.</p> <p>However, these requirements have not been reviewed since their first adoption in 2013. Therefore, they may not reflect the developments or changes in the threshold practice of the professions or reflect the changes in the design of professional education and training programmes.</p> <p>Furthermore, ongoing feedback from education providers of approved programmes has highlighted significant interest in reviewing and updating the Board’s requirements – in particular, the articulation of the requirements – to aid their application in practice. In adopting this option, this feedback from key stakeholders would remain unaddressed.</p>

##### **Option Two: Review and Update Pre-Registration Education and Training Requirements**

<b>Costs</b>	No additional cost
<b>Benefits</b>	<p>Undertaking an extensive review of international comparators and conducting a public stakeholder consultation process, revised pre-registration education and training programmes facilitates the design of standards that reflect the emerging trends and developments within the threshold practice of the professions. This is essential practice in the establishment of standards that will provide assurance of public protection.</p>

	<p>Additionally, it provides scope for updating and revising the articulation of the Board’s pre-registration education and training requirements to align with developments in the design of curriculum and assessment in professional training programmes.</p> <p>In tandem, such updates to the articulation will facilitate greater levels of understandability among the key users of the requirements, aiding the regulatory process and meeting an identified need from stakeholders.</p>
<p><b>Impacts</b></p>	<p>The revision and updating of the Board’s pre-registration education and training requirements will not require any changes to – or addition of further – regulatory intervention.</p> <p>Rather, it provides for the updating of the threshold entry requirements to identify and reflect any developments in the threshold practice of the professions and the design of professional education and training programmes.</p> <p>Following detailed evaluation of international comparators and stakeholder feedback, no significant gaps, errors or omissions were identified in the Board’s revised requirements. The changes made following the Board’s work, in the main, concern the articulation of the requirements rather than making substantive changes to the content of any of the requirements.</p> <p>The only substantive change to the requirements is the reduction in the minimum number of practice placement hours required; a reduction from 1200 hours to 1000 hours.</p> <p>Education providers will be provided with a 12-month period to align their programmes with the updated requirements. Given the limited number of substantive changes, it is anticipated this impact of these changes for education providers will be limited.</p>

**[5] Enforcement and Compliance for Each Option**

The update and review of the Radiographers Registration Board’s pre-registration education and training programmes for Radiographers and Radiation Therapists will not require additional enforcement or compliance processes.

The existing requirements to ensure compliance with the Board’s requirements, as detailed under the provisions of the *Health and Social Care Professionals Act 2005 (as amended)*, remain unchanged:

- One year from the date of adoption by the Board, the revised pre-registration education and training requirements will be enforced. From this date (11 April 2025), all education and training programmes seeking approval from the Board – under Section 48 of the *Health and Social Care Professionals Act 2005 (as amended)* – will be assessed against these revised requirements.
- Under Section 49(1) of the *Health and Social Care Professionals Act 2005 (as amended)*, the Registration Board is required to satisfy itself – through programme monitoring activity – that the education provider continues to meet all its requirements. All education programmes subject to monitoring activity after 11 April 2025 will be assessed against these revised requirements.
- In respect of the recognition of international applications, as detailed under Section 38(2)(c) of the *Health and Social Care Professionals Act 2005 (as amended)*, applicants must demonstrate that they meet the required threshold standard for practice in Ireland as identified by the Registration Board’s *Standards of Proficiency*. From 11 April 2025, international applicants – in line with applicants from the State (through the programme approval and monitoring processes) – will be assessed against these revised requirements.

#### **[6] Review Mechanisms**

The Registration Board cyclically reviews its pre-registration education and training requirements, typically between every 5 and 7 years.

#### **[7] Publication**

This Regulatory Impact Assessment will be published on the CORU website: <https://coru.ie/public-protection/publications/consultation-reports/radiographers-registration-board/>