



Procedure: EP1	Entitlement of Medical and Dental Staff Outside of Radiology Department to Interpret Images
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1. Purpose.

To entitle medical and dental staff within NHS Orkney, outside the Radiology department, to act as operators for clinical evaluation of images

2. Scope

The Regulations require that, following each medical exposure, a 'Clinical Evaluation' must be made and recorded. –Under the Regulations the term "Clinical Evaluation" means 'interpretation of the outcome and implications of, and of the information resulting from, a medical exposure'. This applies for any evaluation that leads to a decision on clinical management irrespective of whether the image is subsequently evaluated by an entitled radiologist.

Clinical evaluation is regarded as an 'Operator' function, and NHS Orkney staff who carry out and record such a clinical evaluation must be entitled as an 'Operator', for a scope of entitlement that includes the radiological examination in question.

This Procedure describes the means of entitlement of medical and dental staff, and Table 1 defines the ranges of medical exposure procedures for which staff in each category may be entitled as an operator, to make and record a clinical evaluation.

3. Means of entitlement

3.1. Entitlement of doctors and dentists who work outside of X-ray department to act as operators for evaluating radiological images is conferred by the Medical Director in accordance with the provisions of Paragraphs 3.2, 3.3 and 3.4 of this Employer's Procedure.

3.2. The Chair of the Radiation Safety Committee (RSC) entitles all doctors and dentists currently employed by NHS Orkney who fall within one of the categories in Column 1 of Table 1. These doctors will be informed of their entitlement by letter. The letter shall include a copy of table 1 detailing their scope of entitlement; a statement of their responsibilities as an operator and list the relevant radiology IR(ME)R procedures they must be familiar with. The statement of responsibilities should include those responsibilities stated in section 4 of this procedure.

3.3. Any doctor newly appointed by NHS Orkney, and falling within one of the categories in Column 1 of Table 1, shall undertake an initial familiarization with relevant NHS Orkney IR(ME)R procedures as set out in appendix 1 of this procedure. This documentation will be sent by the HR department to all doctors with the initial offer of appointment letter / as part of the Board's induction Pack. Doctors and dentists will familiarise themselves with this documentation and sign

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Version: 43	Issue date: March 2018	Review date: March 2020
Storage location: GDrive/Radiology intranet site/		Page 1 of 4

to confirm such using the document EP1_AP1. On receipt of this signed confirmation and other appointment requirements the doctor/dentist will be issued with a contract of employment. That doctor is thereby entitled by the Chair of the RSC as an operator for clinical evaluation of the relevant range of images defined in Column 2 of table 1.

- 3.4. Any doctor or dentist whose category in Column 1 of Table 1 changes, shall be deemed to be entitled by the Medical Director as an operator for clinical evaluation for the range of images defined in Column 2 relevant to the changed category.
- 3.5. NHS Orkney entitles doctors/dentists that have been appropriately entitled as operators for clinical evaluation by other health boards. These doctors are entitled by virtue of their employment and hold their own training records. NHS Orkney may request access to these training records as part of radiology IR(ME)R audit.
- 3.6 NHS Orkney entitles doctors/dentists working as independent contractors as operators for clinical evaluation, providing they hold valid General Medical Council or General Dental Council registration. They shall maintain their own training records, which they may be expected to make available on request.

4. Responsibility of the Entitled Operator

- 4.1. Entitlement means that the operator is entitled to make and record a clinical evaluation falling within their scope of entitlement.
- 4.2. Each entitled operator shall satisfy him/herself that the implied duties meet the requirements of the General Medical Council for registration. Specifically, the General Medical Council states that the duty of a GMC registered doctor includes the requirement that '*as a doctor you must recognise the limits of your own professional competence.*' In this context, entitled operators must be aware that any doubts about interpretation of an image should be referred to an appropriate colleague for advice

5. Responsibility of the entitling Chair of the RSC

It is the responsibility of the Chair of the RSC to ensure that audit of: clinical evaluation of all exposures having been made and recorded by an entitled operator in the appropriate staff category; are included in the Radiology Department Audit procedure

Category of Doctor	Entitlement to evaluate/act on images
Pre-registration doctors	All plain film radiographs.
Post registration doctors	As above, plus fluoroscopic images confined to the speciality in which they practice.
Consultants	All images relevant to specialty.
Dentists	Chest radiographs for foreign body inhalation, facial views, TMJs and mandible views.

Table 1: Defining, for each category of doctor, the range of radiological examinations which may be included in the scope of entitlement.

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Version: 43	Issue date: March 2018	Review date: March 2020
Storage location: GDrive/Radiology intranet site/		Page 2 of 4



Appendix 1

Familiarisation with NHS Orkney IR(ME)R procedures for doctors seeking employment.

Important: This document should be read and filled out by all newly employed doctors before a contract of employment is issued.

Background

The Ionising Radiation (Medical Exposure) Regulations 2000 (IR(ME)R) seek to protect the patient from excessive and unjustified exposures to ionising radiation. The regulations define a number of duty holders known as referrers, practitioners and operators. Referrers request exposures, practitioners justify the exposure and operators are anyone who carries out any practical aspect of the exposure. The employer is responsible for entitling duty holders and for clearly stating what their duties are in a scope of entitlement. For practitioners and operators the scope of entitlement must be supported by training records that demonstrate that the duty holder is competent to carry out those duties.

When requesting an X-ray you will be acting as a referrer under IR(ME)R and will require to be appropriately entitled by NHS Orkney (see EP2). You are also required to return a sample of your signature to the X-ray department using the sample signature form provided (Appendix 2)

IR(ME)R requires that a clinical evaluation of each exposure is made and recorded. Making a clinical evaluation is an operator function and as you may be required to make a clinical evaluation from an X-ray image you must be entitled as an operator with a defined scope of entitlement (as described in table 1 of this procedure EP1).

Familiarisation with Radiology IR(ME)R procedures

NHS Orkney procedures require that before you can be entitled as a referrer or operator you must be familiar with the content of the relevant NHG Orkney written procedures relating to IR(ME)R. The relevant procedures are listed below and are included in your information pack.

- EP 1 Entitlement of Medical Staff Outside of Radiology to Interpret Images
- EP 2 Entitlement and Responsibilities of Medical referrers for medical exposures
- RA 6 Clinical evaluation

Note: From time to time these procedures will be reviewed and updated. Up to date procedures are available for the X-ray department and the intranet.

Declaration

I have read and understood the procedures listed above. As a referrer I understand my duties and scope of entitlement are described in EP2. As an operator I understand my scope of entitlement is that listed in table 1 of document EP1. I also understand my responsibilities when making and recording a clinical evaluation as set out in section 4 of documents EP1 and in RA6.

Signature

Print Name

Date

Once you have signed the declaration the Medical Director entitles to as an operator under IR(ME)R for the a scope of entitlement is listed in table 1 of EP1.

Document no: EP1	Written by: Stephen McCallum /Marthinus Roos/Mike Beach	Authorised by: Chair of RSC
Version: 43	Issue date: March 2018	Review date: March 2020
Storage location: GDrive/Radiology intranet site/		Page 3 of 4

Appendix 2 (Taken From EP1)

IONISING RADIATION (MEDICAL EXPOSURE) REGULATIONS 2000

Specimen signatures of referrers

Name (Print please)	Signature	GMC no

If you are employed as a Locum please confirm the term of your employment. After which your entitlement will cease.

LOCUM STAFF - Employment dates

from:.....until:.....

Access to images required

Yes

No

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Version: 43	Issue date: March 2018	Review date: March 2020
Storage location: GDrive/Radiology intranet site/		Page 4 of 4