

Breast Imaging Department

Ionising Radiation (Medical Exposure) Regulations 2017 Regulation 6 Schedule 2 Employer's Procedures

(b) Procedure to identify individuals entitled to act as referrer, practitioner or operator	
Responsibilities relating to IR(ME)R procedures:	
Ensuring the required IR(ME)R procedures are in place	Worcestershire Acute Hospitals NHS Trust (WAHT)
Authorisation of Breast Imaging IR(ME)R procedures	Clinical Director of Breast Imaging
Development, review and amendment to this document	Superintendent Radiographer
Assisting in development, review and amendment to this document	Radiation Protection Supervisors
Governance pathway:	
Medical Physics Expert review (IRS)	9.12.2022
Circulation to Breast Directorate for approval	11.1.2023
Circulation to Women and Children Division for information	1.3.2023
Circulation to Radiation Protection Committee for information	28.4.2023
Authorised by Clinical Director of Breast Imaging	1.3.2023

Version No	Reviewed	Action	Next Review Date
1	9.12.22 IRS	Revision of format and IRMER audit	
2	12.7.2024 IRS JB	Updated references	12.7.2025

IRMER (b) Procedure to identify individuals entitled to act as referrer, practitioner or operator

Purpose

To clearly identify who is entitled by Worcestershire Acute Hospitals NHS Trust to act as a referrer, practitioner and operator in accordance with the Ionising Radiation (Medical Exposure) Regulations 2017 (IR(ME)R 2017).

This reflects the local decision of the employer.

Scope

All medical exposures carried out by Worcestershire Acute Hospitals NHS Trust Breast Imaging Service Incorporating Hereford and Worcester Breast Screening Service.

Responsibility

Worcestershire Acute Hospitals NHS Trust is responsible for establishing who can act as referrer, practitioner, and operator.

Worcestershire Acute Hospitals NHS Trust has delegated the task of formulating and updating this procedure to the Clinical Director of Breast Imaging.

Practice

Members of the following staff groups may act as referrer, practitioner or operator as detailed in sections A, B and C.

A. Referrer

Definition:

A registered health care professional within the meaning of section 25(3) of the NHS Reform and Health Care Professions Act 2002, who is entitled in accordance with the employer's procedures to refer individuals for exposure to a practitioner. The Regulations do not allow the patient to be a referrer.

Decisions on who is entitled to act as a referrer should be taken at local level by agreement between the Breast Directorate and the healthcare professionals involved in medical exposures. The Worcestershire Acute NHS Trust is required to make referral criteria available to all referrers.

1. Worcestershire Acute Hospitals NHS Trust entitles the persons given in Table 1 to act as referrers within the scope specified.
2. Worcestershire Acute Hospitals NHS Trust has adopted the referral criteria which are described in (Appendices 1,2,3 and 4).

Duties and Responsibilities:

The referrer must supply the practitioner with sufficient medical data relevant to the medical exposure requested, to enable the practitioner to decide on whether there is justification for the exposure to go ahead. As a minimum requirement, the referrer must always supply the following information:

- Sufficient information to enable the patient to be accurately and uniquely identified in accordance with IR(ME)R Procedure 1.
- Clinical information to justify the medical exposure.
- The initials and/or signature uniquely identifying the referrer. This can be electronic if processed through ICE order comms to the CRIS system.

Author(s): D.Fox J.Broomer	Authorised by: Dr P.Haggett	Issue Date: 1.3.2023	Review date: 12.7.2025
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An examination must not be carried out without a written / electronic request from the referrer or someone authorised to request on behalf of the referrer.

Table 1: Staff entitled to act as Referrers

Category of Referrer	Expected level of Training	Scope of referral
Consultant Radiologist	State registration & Appropriate Royal College Fellowship	All ionising radiation examinations including assessment procedures as part of the NHSBSP.
Medical Consultant or Senior Registrar	State registration & Appropriate Royal College Fellowship	All examination types and breast interventional procedures
Consultant Radiographer	State Registered Radiographer, plus the Certificate of competence in mammography and a post graduate qualification in image interpretation; interventional breast procedures and breast ultrasound.	All ionising radiation breast examinations including assessment procedures as part of the NHSBSP.
Radiographer Advanced Practitioners	State Registered Radiographer, plus the Certificate of competence in mammography and a qualification in image interpretation and/or interventional breast procedures.	Screening mammograms* and referral to assessment as part of the NHSBSP
Radiographers	State Registered Radiographer plus the Certificate Of Competence in Mammography	Screening mammograms* as part of the NHSBSP
Named Clinical Nurse Practitioners	State Registration. Training completed to include radiation physics and IRMER, historically in house with completion of competencies. Currently completion of e-learning module e-IRMER via Electronic Staff Record (ESR), completion of competencies and supporting evidence from relevant Clinical Director.	Investigations and their Criteria for Referral are detailed in the 'Non- Medical Referrer imaging Policy' (pg31) found on the intranet via www.treatmentpathways.worc.sacute.nhs.uk/referenceguides/radiology-information-portal/radiology-information-portal/ See Appendix 2

* See "Referral Criteria and Authorisation and Justification for Screening Mammography and Assessment Procedures" in the (Appendix 1).

NB. There is no requirement for a named referrer when a woman undergoes an exposure as part of the Breast Screening Programme following an invitation.

It is a disciplinary offence for those not entitled by the Trust to act as referrer, to refer a patient for a medical exposure.

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B. Practitioner

Definition:

A registered health care professional who is entitled in accordance with this procedure to take responsibility for an individual medical exposure.

Worcestershire Acute Hospitals NHS Trust entitles the personnel given in table 2 to act as practitioners within the scope specified.

Table 2: Staff entitled to act as practitioners

Category of Practitioner	Training requirements	Scope of justification
Consultant Radiologist	State Registration plus FRCR	Screening mammography and assessment procedures as part of the NHSBSP All breast examinations and interventional procedures.
Consultant Radiographer	State Registration plus the Post Graduate Certificate in Mammography Practice.	Screening mammography and assessment procedures, as part of the NHSBSP. Mammograms as in agreed practitioner protocol.
Named Radiographer & Radiographer Advanced Practitioner	State Registration plus the Post Graduate Certificate in Mammography Practice.	Screening mammography and assessment procedures, as part of the NHSBSP. Mammograms as in agreed practitioner protocol.

Responsibilities

1. The practitioner is responsible for the justification of a medical exposure and, keeping the dose to the patient as low as reasonably practicable consistent with the intended purpose.
2. The practitioner must check that the most recent mammogram was more than 6 months ago for screening examinations, 12 months for follow up examinations; with the exception of technical repeat imaging.
3. For symptomatic examinations, the practitioner must document that they have justified the examination in the CRIS system.
4. The operator must check that justification has been done before undertaking the examination.

Protocol for justification is shown in appendix 2 and 3; justification of surveillance of High Risk women is defined by national protocols (link appendix 4)

C. Operator

Definition:

An operator is any person who is entitled in accordance with this procedure, to carry out practical aspects of a medical exposure including the physical conduct of the exposure and any supporting aspects, patient identification and authorisation. The Medical Physics Expert is also an operator.

Responsibilities:

All operators have a duty to ensure the radiation dose to the patient is as low as reasonably practicable, whilst maintaining sufficient image quality for the diagnostic purpose.

A person undergoing practical training may undertake certain operator duties whilst under the supervision of an appropriately trained operator.

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No ionising radiation exposures are made unless an appropriately trained operator is present.

Worcestershire Acute Hospitals NHS Trust entitles the personnel given in table 3 to act as operators within the scope specified. Any staff acting as operators as part of their training, can do specific tasks unsupervised, provided that they are “signed off” as appropriately trained for these tasks.

Practice to be followed when acting as an operator:

- Operator MUST follow Society of Radiographers ‘Paused and Checked’ directive
- Operator MUST check patient’s details and enquire about the relevant clinical history.
- Operator MUST enquire with the patient concerning their examination history to check if they have had a recent mammogram
- Operator MUST check that the examination has been justified before the examination.
- Operator MUST make a final check that the examination has not been performed recently
- Operator MUST document the examination in the electronic record.

Table 3 Appropriate basic qualifications for operators:

Radiologist	State Registration plus FRCR
Consultant Radiographer Advanced Practitioner	State Registration plus the Post Graduate Certificate in Mammography Practice.
Radiographer	State Registration plus the Post Graduate Certificate in Mammography Practice.
Assistant Practitioner or Associate Mammographer	Foundation Degree in Health & Social Care (Mammography); BTec in Imaging (Mammography); Cert HE in Health & Social Care (Radiography); Or Level 4 Mammography Associate Apprenticeship
Clinical Scientist	State Registration
Clinical Technologist	BTec, BSc in Clinical Technology

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Table 4 Personnel entitled to act as operators:

The following persons are identified as operators associated with specific tasks in relation to mammographic exposures. They have the responsibility for ensuring that practical aspects of the exposure under their control are carried out in accordance with their professional or other relevant training and are also in accordance with the departments operating policies.

See also “Referral Criteria and Authorisation and Justification for Screening Mammography and Assessment Procedures” in the (Appendix 1).

Practical Aspects of Operator	Category	Additional training requirements in addition to basic qualification (see Table 3)
Patient Identification	All Staff	Familiar with the practice covered in IR(ME)R Procedure 1
Clinical Evaluation	Radiologist (see Appendix 2) Consultant Radiographer Named Advanced Practitioner (see Appendix 3)	Specific training in reading screening mammography films and symptomatic breast examinations.
Performing all mammographic exposures	Radiographer	Postgraduate Certificate in Mammography Practice.
Performing standard mammographic exposures	Assistant Practitioner or Associate Mammographer	Appropriate clinical training
QA (including testing before use and routine level B tests)	Medical Physics staff	Technical and scientific staff deemed competent by IRS.
QA on X-ray equipment (level A tests)	Radiographer	Certificate of competence in mammography
QA on X-ray equipment (level A tests)	Assistant Practitioner or Associate Mammographer	Appropriate QA training
Authorisation of exposures	Radiographer	Familiar with justification criteria agreed by practitioner(s)
Medical Physics Expert	Physicist Clinical Scientist	Technical and scientific staff deemed competent by IRS.
Service and maintenance	Service Engineer	Appropriate training

Appendix 1 Screening mammography and Assessment Imaging:

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Appendix 2 Symptomatic Imaging:

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Appendix 3 Surveillance Imaging:

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Appendix 4 High Risk Surveillance Imaging:

[Protocols for surveillance of women at very high risk of developing breast cancer - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

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