HSE HR Circular 021/2014

To: Each Member of Leadership Team, HSE; 
Each Assistant National Director of Human Resources, HSE; 
Each Employee Relations Manager, HSE.

Re: HSE policy on Annual Certification of Registration of Radiographer and Radiation Therapists with the Radiographers Registration Board at CORU 2014

Dear Colleagues

CORU, the umbrella body for the statutory regulation of the health and social care professions named in Section 4 of the Health and Social Care Act 2005, (the Act), opened the Radiographers Register on 31 October 2013. The move to statutory registration means that all practitioners using the protected title ‘Radiographer’ or ‘Radiation Therapist’ must be registered in either the Radiographers Division or the Radiation Therapists Division of the Register.

Registration Board
The Radiographers Registration Board has established two processes for gaining registration with the Board. The procedures established by the Radiographers Registration Board govern the registration of applicants who:

A) were existing practitioners engaged in Radiography or Radiation Therapy in the Republic of Ireland for the equivalent of two years full time between 31 October 2008 to 31 October 2013, and,

B) new entrants to the profession in Ireland who commenced their practice on or after 31 October 2013.

Radiographers or Radiation Therapists who qualify as existing practitioners under A) have, under the established grandfathering period, until the 31 October 2015 to apply for registration. This 2 year transitional period will cease on 31 October 2015.
Radiographers or Radiation Therapists who are deemed to be new entrants under B) above must be registered in the relevant division of the Radiographers Register before they can commence practice in the Republic of Ireland.

The establishment of the Registration Board means that the HSE can only employ and maintain in employment those practitioners who are registered as Radiographers or Radiation Therapists with the Registration Board.

**HSE Policy**
To ensure that the HSE meets its obligations and responsibilities in this regulated environment the attached policy, *HSE policy on Radiographers and Radiation Therapists annual certification of registration with the Radiographers Registration Board at CORU 2014* is now being issued.

The purpose of this policy and procedure is to protect patients, service users and HSE employees and to provide evidence in support of good governance.

This document states that it is the policy of the Health Service Executive to employ and to maintain in employment Radiographers and Radiation Therapists who furnish the HSE with proof of their registration in the register maintained by the Registration Board and maintain registration on that register.

The policy recognises the different registration procedures applicable to the two cohorts of Radiographer and Radiation Therapist, those appointed before 31 October 2013 and those appointed on or after 31 October 2013, and sets out the procedures to be followed by members of these two cohorts to assure the HSE that they are appropriately registered and legally entitled to engage in the protected profession of Radiography and Radiation Therapy.

**Radiographer or Radiation Therapists employed on or after 31 October 2013**
Members of this group are required to provide proof of registration and to sign the Patient Safety Assurance Certificate (PSAC) by 31 November 2014 confirming;

- That they are appropriately registered in the relevant Division of the Register maintained by the Registration Board,
- That they will advise the HSE without delay if there is any change in their registration status by way of restrictions or conditions placed on their practice or through erasure from the register or any other change to their status,
- The name under which they are registered with the Registration Board,
- That they have advised the Registration Board of their current personal and professional contact details.
Implementation of the policy and procedure in respect of this group requires:

- Radiographer or Radiation Therapists to complete the Patient Safety Assurance Certificate (PSAC) by 31 November 2014,
- Practitioners to produce proof of registration in the appropriate division of the Register by the 31 November 2014
- Entering the data specified in the policy at 7.1.4 into the SAP HR system
- HSE South recording the data specified in the policy at 7.1.4 in appropriate employee records system as SAP HR has not been deployed in this Region.

Radiographers and Radiation Therapists employed before 31 October 2013
Members of this group are required to confirm and provide proof that they have applied for registration with the Registration Board at CORU by 31 October 2015. This confirmation must be presented to the HSE by the 16 November 2015.

This policy is effective from the DATE OF ISSUE 16th September and will be revised in 2015 following consultation with CORU.

Please bring this policy to the attention of all relevant staff in your area of responsibility.

The policy will be available on the HSE Intranet and Website at the following links:

http://hsenet.hse.ie/Intranet/Human_Resources/resources/

http://www.hse.ie/portal/eng/staff/Resources/hrppg/PoliciesProcedures.html

Any queries in respect of this Circular should be directed to Mr. Paddy Duggan, Workforce Planning, Analysis and Informatics, HR Directorate, HSE, Oak House, Millennium Park, Naas, Co. Kildare. Tel: 045 882541 or by e-mail to paddy.duggan2@hse.ie

Any queries relating to application for registration with the Radiographer or Radiation Therapists Registration Board should be directed to registration@coru.ie and general queries on registration boards established by CORU should be directed to info@coru.ie or visit www.coru.ie

Yours sincerely,

Barry O’Brien
National Director of Human Resources
HSE policy on Annual Certification of Registration of Radiographers and Radiation Therapists with the Radiographers Registration Board at CORU 2014

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1.0 Policy Statement:

1.1. Radiographer or Radiation Therapists employed by the HSE on or after 31 October 2013

It is the policy of the Health Service Executive (HSE) to employ and to maintain in employment Radiographers or Radiation Therapists who on appointment and annually thereafter furnish the HSE with proof of their appropriate registration in the register maintained by the Radiographers Registration Board at CORU and maintain registration on that register.

It is the policy of the HSE to require Radiographers and Radiation Therapists to certify annually, by way of the Patient Safety Assurance Certificate (PSAC), Appendix 1:

- That they are appropriately registered on the register maintained by the Registration Board,
- That they will advise the HSE without delay if there is any change in their registration status by way of restrictions or conditions placed on their practice or through erasure from the register or any other change to their status,
- The name under which they are registered with the Registration Board.

It is the policy of the HSE to suspend from employment any Radiographer or Radiation Therapist who does not provide proof of registration and the PSAC to their head of discipline or service manager by 30 November 2014.

The HSE reserves the right to report to An Garda Siochana, in support of section 80 of the Health and Social Care Professionals Act 2005, any employee of the HSE who presents themselves as a Radiographer or a Radiation Therapist to the HSE or practises as a Radiographer or a Radiation Therapist in the HSE without the appropriate registration with the Registration Board.

1.2. Radiographer or Radiation Therapists employed by the HSE before 31 October 2013

It is the policy of the Health Service Executive (HSE) to require Radiographers or Radiation Therapists employed by the HSE before 31 October 2013 to furnish the HSE with proof of their application to be registered as a Radiographer or Radiation Therapist with the Registration Board by 16 November 2015.

1.3. Radiographer or Radiation Therapists employed by funded agencies

Agencies funded by the HSE have a responsibility in the Service Arrangements, Part 1, Provider Personnel, section 16.2 and Part 2, Schedule 2, Quality and Safety to employ, contract, engage or accept, as part of the provision of the Services, only such persons who are registered, and maintain a current valid registration, with the appropriate statutory registration body. HSE funded agencies are responsible for the development, implementation and monitoring of appropriate policies and procedures in support of this requirement.

2.0 Purpose: The purpose of this policy and procedure is to protect patients, service users and HSE employees and to provide evidence in support of good governance.

3.0 Scope: This Policy and procedure applies to:
- Each individual employed as a Radiographer or a Radiation Therapist by the HSE,
- Each person employed in a position that requires a radiography or radiation therapy qualification and registration with the Registration Board,
- Radiography Services Managers and Radiation Therapy Service Managers,
- Managers of Services, who are not Radiographers or Radiation Therapists and who are responsible for managing Radiographers or Radiation Therapists,
- Each National Director, Hospital Group Manager, ISA Manager, Assistant National Director of Human Resources at Regional level, Assistant National Director of Human Resources, Health Business Services and the individuals designated by them, or new roles introduced following restructuring, for the purpose of ensuring compliance with this policy and procedure.

4.0 Legislation/other related policies:

- Other related policies: Disciplinary Procedure for Employees of the Health Service Executive 2007.

5.0 Glossary of Terms and Definitions: Explanation of key technical terms or terminology that are referred to in the PPG.

- CORU – Statutory body regulating Health and Social care Professionals,
- Other staff record system - As SAP HR has not been deployed in HSE South it will use its existing staff record system to comply with this policy and procedure,
- PSAC - Patient Safety Assurance Certificate,
- Relevant Service Manager - A manager who is not a Radiographer or Radiation Therapist but has responsibility for managing Radiographer or Radiation Therapists,
- Radiographer or Radiation Therapist – an individual who uses the protected title regulated by the Radiographers Registration Board at CORU,
- Registration Board – The Radiographers Registration Board at CORU.

6.0 Roles and Responsibilities:

6.1 Radiographer or Radiation Therapists

6.1.1 The individual Radiographer or Radiation Therapist is, as a condition of their employment, personally responsible and accountable for maintaining appropriate registration in the register maintained by the Registration Board.
6.1.2 **The Radiographer or Radiation Therapist referred to in 1.1** is personally responsible for providing proof of registration and completing the PSAC by 30 November 2014.

6.1.3 **The Radiographer or Radiation Therapist referred to in 1.2** is personally responsible for applying for registration as a Radiographer or Radiation Therapist to the Registration Board on or before 31 October 2015 and providing proof of their application to the HSE by 16 November 2015.

6.2 **Radiography Services Managers, Radiation Therapy Service Managers or Service Manager with responsibility for Radiographers or Radiation Therapists is responsible for:**

6.2.1 Requesting Radiographers or Radiation Therapists who commenced employment on or after 31 October 2013 to provide proof of appropriate registration and to complete the PSAC by 30 November 2014.

6.2.2 Requesting Radiographers or Radiation Therapists who were employed by the HSE before 31 October 2013 to provide proof by 16 November 2015 that they have applied for registration as a Radiographer or Radiation Therapist with the Registration Board on or before 31 October 2015. The acceptable proof is the acknowledgement of their completed application from the Registration Board.

6.2.3 Advising each Radiographer or Radiation Therapist that failure to provide proof of registration and complete the PSAC or provide proof of application for registration with the Registration Board by the appointed date may result in suspension from employment and investigation under the HSE’s Disciplinary Procedure.

6.2.4 Storing the completed PSAC or proof of registration in the local site.

6.2.5 Ensuring that a validated copy of the completed PSAC is passed to the local personnel administration office for entry onto the SAP HR system or other staff record systems.

6.2.6 Advising the relevant National Director, through local management structures of the names of the Radiographer or Radiation Therapists who fail to complete the PSAC or provide proof of application for registration by the appointed date.

6.2.8 Advising any Radiographer or Radiation Therapist, including those on any type of leave or secondment, who fails to complete the PSAC or provide proof of application for registration by the appointed date, they may be suspended from employment, on the grounds of patient safety, pending further investigation of their registration status in compliance with this policy and procedure.

6.2.9 Ensure that a failure to complete a PSAC or provide proof of application for registration by the appointed date is managed in compliance with this policy and is investigated using the HSE’s Disciplinary Procedure.
6.3 The Regional Assistant National Directors of HR and the Assistant National Director of HR, Health Business Services is responsible for;

6.3.1 Establishing a process within their Region or Service that will ensure that the required information is recorded on the SAP HR system or other staff record system (HSE South) by 31 January 2015.

6.4 Each National Director is responsible for ensuring that this Policy and Procedure: is implemented in their Directorate. Each National Director is also responsible for identifying and implementing the necessary systems and processes within their Directorate in support of this policy and procedure.

7.0 Procedure

7.1. Procedure in respect of Radiographers or Radiation who were employed on or after 30 October 2013

The relevant Radiography Services Manager, Radiation Therapy Service Manager or Service Manager will request Radiographers or Radiation Therapists employed on or after 31 October 2013 to provide proof of registration and to complete the PSAC by 30 November 2014.

7.1.2 A copy of the completed and validated PSAC will be sent by the relevant Radiography Services Manager, Radiation Therapy Service Manager or Service Manager to the local personnel administration office for entry onto SAP HR system or other staff records system. A copy will be maintained locally by the relevant Radiography Services Manager, Radiation Therapy Service Manager or Service Manager for audit purposes. Validation entails confirming the Radiographer or Radiation Therapist’s name and registration number in the register maintained by the Registration Board using the Health and Social Care Professional Council’s website, www.coru.ie

7.1.3 Advising each Radiographer or Radiation Therapist that failure to A) provide proof of registration and to complete the PSAC or B) provide proof of application for registration with the Registration Board by the appointed date may result in investigation under the HSE’s Disciplinary Procedure and suspension from employment.

7.1.4 The following information will be entered into the Radiographers or Radiation Therapists record in the SAP HR system or other staff record systems by the designated personnel administration section.

<table>
<thead>
<tr>
<th>Information required</th>
<th>SAP field</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of the statutory regulatory authority</td>
<td>ID Type)</td>
</tr>
<tr>
<td>Registration number</td>
<td>(ID number)</td>
</tr>
<tr>
<td>PSAC expiry date of 30 November annually</td>
<td>(Valid to)</td>
</tr>
</tbody>
</table>

Radiographers or Radiation Therapists who submit the PSAC will have the status Active entered in their record in the Application Status field on SAP HR. A similar description will be entered in the appropriate field in other staff record systems.

7.1.5 The names of the Radiographers or Radiation Therapists who by 30 November have not supplied proof of registration and the PSAC will be forwarded by the relevant professional head of discipline or relevant
service manager, through local management structures to the relevant National Director.

7.1.6 Following a preliminary review of the facts by the relevant AND of HR and the professional head of discipline or relevant Service Manager the Radiographer or Radiation Therapist may be suspended from employment pending a full investigation using the HSE’s Disciplinary Procedure.

8.0 Revision and Audit
This policy will be kept under review during 2015 and will be amended to reflect the emerging structures and changes to roles and responsibilities.

The implementation of this policy and procedure will be reviewed in February 2015 by nominations from the Acute Hospitals Division and the National HR Directorate.

This policy will be amended in 2015 as the grandfathering arrangements for registration will no longer be applicable.

9.0 References/bibliography: N/A

10.0 Appendices:
Appendix 1 The Patient Safety Assurance Certificate
Radiographer and Radiation Therapist Patient Safety Assurance Certificate
To be completed by 30 November 2014 by practitioners who commenced employment on or after 30 October 2013

I (Name) ___________________________ Employee number __________

D.O.B. ________

Birth name (if different from above) _____________________________________________

Employed by the HSE in (service and location) ____________________________ in

the capacity of ________________________________ (title and grade)

am appropriately registered in the register maintained by the Registration Board

My registered name with the Registration Board is ____________________________

I confirm that I will advise the Health Service Executive without delay should there be any change in my registration status with the Registration Board during the year. I understand that change in status means non registration, any restriction, conditions, censure, admonishment or removal from the register under Part 6 of the Health and Social Care Professionals Act 2005 and the Health and Social Care Professionals (Amendment) Act 2012.

I also confirm that I have advised the Registration Board of my current address and employer.

I also confirm that I will advise the Registration Board of any change in my family name, address or employer.

I make this statement so as to provide assurance to patients, service users and fellow employees.

I also acknowledge that should I practice as a Radiographer or Radiation Therapist without appropriate registration that I may be prosecuted under section 80 of the Health and Social Care Professionals Act 2005 and the Health and Social Care Professionals (Amendment) Act 2012.

Registration Number ____________________

Signed: ___________________________ Date: ________________

Print name: ________________________________

Validated by ________________________________

Title __________________________ Date ________________