

# Student radiographers & trainee assistant practitioners as Operators under The Ionising Radiation (Medical Exposure) Regulations (IR(ME)R)

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## Summary

This statement was updated considering The Ionising Radiation (Medical Exposure) (Amendment) Regulations 2024<sup>1</sup> which came into effect on 1 October 2024. The Ionising Radiation (Medical Exposure) Regulations 2017<sup>2</sup> and The Ionising Radiation (Medical Exposure) (Northern Ireland) Regulations 2018<sup>3</sup> came into force on 6 February 2018 in accordance with the European Council Directive 2013/59/Euratom<sup>4</sup>. Both the Great Britain and Northern Ireland regulations<sup>1-3</sup> have the same requirement relating to entitlement of student radiographers (including apprentices) and trainee assistant practitioners; therefore, throughout this document they will be jointly referred to as IR(ME)R. This statement explains the advice given by the Society of Radiographers (SoR) and the College of Radiographers (CoR) that student radiographers, apprentices, (hereafter included in student radiographers) and trainee assistant practitioners should not be entitled as Operators under IR(ME)R.

## Background

IR(ME)R identifies four duty holders, each of whom has clearly identified responsibilities under the regulations: the Employer, Referrer, Practitioner and Operator. For the purpose of clarity in this document, these duty holders are represented by capitalised words in order to distinguish this role from an individual's job title.

It has come to the attention of the SoR and CoR that some student radiographers and trainee assistant practitioners have been listed as one of the IR(ME)R duty holders (Operators) under the relevant IR(ME)R Employer's Procedures within clinical imaging and radiotherapy departments. The definition of Operator is stated in IR(ME)R as "any person who is entitled, in accordance with the Employer's procedures, to carry out practical aspects of an exposure"<sup>1-3</sup>. This is different from anyone who acts under the direct supervision of a person who is adequately trained.

The SoR and CoR believe it necessary to provide updated guidance for radiography education providers and clinical services managers about the entitlement of students and trainees as IR(ME)R Operators during their education and training periods and whilst undertaking practice-based learning.

Operators should not carry out a medical exposure or any practical aspect (including any authorisation pursuant to Regulation 11 (5)) without having been adequately trained (Regulation 17 (1)). The Employer must take steps to ensure that every Operator is adequately trained in accordance with IR(ME)R Regulation 17 and undertakes continuing education and training including, in the case of clinical use of new techniques, training related to those techniques and the relevant radiation protection requirements. The Employer must satisfy themselves that a person is adequately trained and should specify the scope of practice and the tasks for which an individual can act as an Operator.

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## Society and College of Radiographers guidance

Persons entitled to act as an IR(ME)R Operator must have undergone training in those subjects in Schedule 3 of IR(ME)R<sup>5</sup> which are relevant to their functions and area of practice. The SoR and CoR recognise that the pre-registration radiography education programmes it approves, and which are approved by the Health and Care Professions Council (HCPC) to give eligibility for registration as a radiographer, address the requirements of Schedule 3 of IR(ME)R. Hence, these may be used as the benchmark by which the Employer defines ‘adequate training’ as an individual moves from being a student radiographer to a registered radiographer. For some aspects of radiographic practice the Employer will require the radiographer to undertake some additional practical training before Operator entitlement is given, e.g. local training on new equipment or modalities.

Whilst undergoing training, the requirements of Schedule 3 are unlikely to be fulfilled prior to graduation/qualification and in these cases Regulation 17(3) of IR(ME)R is relevant, where supervision still applies. Student radiographers and trainee assistant practitioners should be directly supervised by an HCPC registered radiographer whilst in the clinical environment. The supervising radiographer will be responsible for the practical aspects carried out by the student and therefore is the Operator for that medical exposure. It may be possible that a student radiographer or trainee assistant practitioner completes relevant sections of Schedule 3 to deem them competent in a specific task and therefore could be entitled as an Operator within a very limited scope of practice; however, this would need to be continually reviewed and updated by the Employer.

If an Employer entitles a student radiographer or trainee assistant practitioner as an Operator, there must be a robust local entitlement process within the clinical department which satisfies the relevant sections of Schedule 3. This should describe clearly the standards required for each area of practice, e.g. musculoskeletal (MSK) radiography, chest radiography, abdomen and pelvis radiography,

fluoroscopy etc. The SoR and CoR would not advise entitling trainees as Operators for paediatric radiography or individuals of childbearing potential due to the higher radiation risks and the IR(ME)R requirements for particular attention to exposures for these individuals. As part of the entitlement process, the necessary information surrounding the individual’s (student/trainee) scope of practice, the theoretical and practical training given as well as an assessment of competence must be documented clearly in the individual’s training record in line with the IR(ME)R Employer’s Procedures.

Educators should consider how any adjustments to entitlement might be reflected by the indemnity insurance they provide trainees. SoR Professional Indemnity Insurance (PII) applies to students acting under supervision. More information can be found [here](#).

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If an Employer chooses to entitle a student or trainee as an Operator, that Employer assumes responsibility for ensuring that adequate and up-to-date local training of the entitled Operator is delivered and recorded, and is consistent with the tasks the individual is entitled to carry out. It is the Employer's responsibility to maintain documented and up-to-date evidence of adequate training for all entitled IR(ME)R duty holders and this includes all student radiographers and trainee assistant practitioners that the Employer decides to entitle as Operators.

Assistant practitioners are normally employees and those who have successfully completed a CoR-approved training programme will have undertaken the necessary 'adequate training' to enable the Employer to entitle them as Operators.

However, it should be noted that for both student radiographers and trainee assistant practitioners, education providers and clinical services managers are advised that the CoR believes it is inappropriate for employers to entitle them as an Operator to act in their own right.

Nevertheless, if an Employer is satisfied that evidence of an appropriate assessment and an up-to-date training record is held and maintained by the relevant clinical imaging or radiotherapy services departments, it is possible for a student to be entitled as an IR(ME)R Operator with an appropriately restricted and defined scope of practice.

## Conclusion

In conclusion, therefore, whilst possible under legislation, the SoR and CoR advises that student radiographers and trainee assistant practitioners are not entitled as IR(ME)R Operators.

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## References

1. The Ionising Radiation (Medical Exposure) (Amendment) Regulations 2024. Available from: <https://www.legislation.gov.uk/uksi/2024/896/contents/made> [accessed February 5, 2025].
2. The Ionising Radiation (Medical Exposure) Regulations 2017. Available from: <https://www.legislation.gov.uk/uksi/2017/1322/contents/made> [accessed June 30, 2023].
3. The Ionising Radiation (Medical Exposure) Regulations (Northern Ireland) 2018. Available from: <https://www.legislation.gov.uk/nisr/2018/17/contents/made> [accessed June 30, 2023].
4. Council Directive 2013/59/Euratom. Available from: <https://eur-lex.europa.eu/eli/dir/2013/59/oj/eng> [accessed March 10, 2025].
5. The Ionising Radiation (Medical Exposure) Regulations 2017; SCHEDULE 3. Available from: <https://www.legislation.gov.uk/uksi/2017/1322/schedule/3> [accessed March 14, 2025].



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