

Guidance on scope of practice for advanced practitioners and consultant practitioners 2025

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1. Introduction

The Society of Radiographers (SoR) *Scope of Practice* (SoR 2024c) sets out the scope of practice of radiography for members of the professional workforce. The ‘professional workforce’ includes radiographers, sonographers and other disciplines (SoR 2024a).

This document provides additional guidance on scope of practice for members working in advanced and consultant practice roles.

There are increasing opportunities for members to undertake education and training that allow them to practise safely and effectively in advanced and consultant practice roles.

These roles include:

- Advanced and consultant practice roles that are within the primary scope of practice of radiography, in the fields of clinical imaging and oncology.
- Advanced and consultant practice roles that are outside the primary scope of practice of radiography, where the member undertakes other roles within health and care that require professional registration and draw on their professional background. These roles are sometimes referred to as ‘non-traditional’ roles and are often undertaken by professionals from a range of regulated professions.

In this document, we refer to members in advanced practice roles as ‘advanced practitioners’. We refer to members in consultant practice roles as ‘consultant practitioners’.

As advanced and consultant levels of practice continue to develop, members, their employers and service providers are navigating the safe and legal boundaries of professional practice. There can sometimes be a lack of understanding of what advanced practitioners and consultant practitioners are able to do safely, effectively and legally. This can sometimes lead to advanced practitioners and consultant practitioners, particularly in ‘non-traditional’ roles, facing barriers that mean they are unable to practise to the full extent of their scope of practice. There can also be barriers for members who aspire to practise at these levels.

This document has been written to support advanced practitioners and consultant practitioners in navigating scope of practice issues and aims to help prevent and address any unnecessary or inadvertent barriers to practice that might arise. It may also be useful for service providers and employers and for members who aspire to advanced and consultant practice roles.

Although we have written this with advanced and consultant practice in mind, the underpinning principles it outlines will be relevant to members working at other levels of professional practice.

Scope of practice – profession and individual

The **scope of practice of the profession** is the knowledge, skills and activities that are typically considered to fall within the practice of a particular profession. The scope of practice of the profession is underpinned by the evidence base and shaped through professional consensus and authoritative professional standards and guidance – for example, published by the Society and College of Radiographers (ScoR) and by regulatory and registration bodies. The scope of practice of the profession may change over time as it continues to develop and innovate to meet the needs of health and care services and patients.

The **scope of practice of the individual professional** is the activities that an individual professional has appropriate education, training and experience to carry out safely, effectively and lawfully. The scope of practice of the professional will develop over time and will be unique to the individual, influenced by their career, education, experience and development.

The individual professional might safely and legitimately develop their scope of practice into other areas of their profession, such as roles in education or research, or into areas that utilise and build on their professional background but are outside what other members of their profession would typically consider to be the 'primary' or 'core' scope of practice of the profession.

All members of the professional workforce, whatever their specific role, are required to practise within their scope of practice. This means:

- Making sure that they have the knowledge, skills and experience required to practise safely and effectively in their role. This includes by successfully completing any required post-registration education and training.
- Working within the legal, professional, ethical and governance frameworks relevant to their practice and role. This includes, for example, following standards and guidance published by professional, regulatory and registration bodies and working within the policies and procedures of service providers and employers.
- Maintaining and developing their scope of practice by:
 - » seeking support where required
 - » participating in supervision and quality assurance and audit activities
 - » undertaking continuing professional development (CPD).
- Prioritising patient-centred care and patient safety at all times.

Source: Society of Radiographers (2024c). *Scope of Practice*.

2. Advanced and consultant practice

Advanced practice and consultant practice are multiprofessional levels of professional practice. Definitions of advanced and consultant practice are outlined below.

Advanced practice

Advanced practitioners will have developed advanced clinical competence in their specialist area or across a broad range of practice. They will display a high degree of autonomy and complex decision-making skills that are underpinned by a wider foundation of knowledge, skills and expertise from their previous roles to enable safe, effective and person-centred care. Possessing a full master's degree relevant to advanced clinical practice, they will meet the four pillars of advanced clinical practice (clinical practice, education, leadership and management and research and development), using critical thinking and problem-solving to research and analyse complex situations throughout their practice. Drawing on their education and training and clinical experience, and employing the available evidence base, they will have extensive clinical responsibilities and input into the education of interprofessional colleagues and service development. Advanced practitioners will demonstrate leadership capabilities, managing whole episodes of clinical care in their area of practice.

Consultant practice

[...] Consultant Practitioners demonstrate expert clinical capabilities that are built on previously developed experience and learning. They display independent decision-making in complex situations to enable service development by generating an evidence base. They are at the forefront of their field and lead development of original thinking for fundamental change to achieve service evolution. The Consultant Practitioner strategically synergises the pathway, service, organisation and system by working with service users, partners and the practice community via local, regional, national and international perspectives to improve service delivery. Consultant Practitioners build and lead teams to facilitate strategic directional change. Possessing master's degrees or the equivalent and holding or working towards a doctoral level qualification, they have the ability to research and analyse complex situations. They will have significant clinical responsibilities and will usually also hold education responsibilities in both clinical and academic environments. They will demonstrate extensive leadership abilities.

Source: College of Radiographers (2022). *Education and Career Framework for the Radiography Workforce* (4th edition).

There are published frameworks in each of the four countries of the UK that provide definitions of advanced and consultant level practice and set out the capabilities that are required. These capabilities are multiprofessional and members working at these levels will demonstrate the capabilities in relation to their profession, job role and area of practice. These frameworks inform and shape education and training, role development and scope of practice in advanced and consultant practice. See references for more information.

To move into advanced practice roles, a member will complete a full master's degree that addresses all the required advanced practice capabilities across all four pillars of professional practice:

- clinical practice
- leadership and management
- education
- research and development.

As advanced practice education and training develops, and continues to develop, there may be some advanced practitioners who have followed different education and training pathways into advanced practice roles.

An employer will normally identify a need for a prospective advanced practitioner role and appoint to a trainee advanced practitioner position. They will then support the trainee to complete their education and training, including supervised clinical preparation in the workplace. Once the trainee has successfully completed their training, they will take up the advanced practice role.

In addition to master's level qualifications, members appointed to consultant practitioner roles will normally hold, or be working towards, doctoral level qualifications. We have published guidance to support consultant radiographer roles (SoR 2022).

For both advanced and consultant practice roles, employers will put in place arrangements for appropriate governance, supervision and support so that advanced practitioners and consultant practitioners can practise safely and effectively.

Advanced practitioners and consultant practitioners practise within multidisciplinary teams. The majority of roles open to members will be within the primary scope of radiography practice in the fields of clinical imaging and oncology.

Some roles (or parts of roles) may be outside the primary scope of radiography practice but still safely and legitimately draw on and build upon the education, knowledge, skills and experience of the member – for example, their skills in assessment, communication, planning and treatment. Emerging roles include, for example, members being supported by their employers to undertake education and training equipping them to assess, treat and manage the care of patients outside clinical imaging and oncology, in areas such as emergency medicine, frailty, general medicine and palliative care.

The College of Radiographers (CoR) *Education and Career Framework for the Radiography Workforce* (CoR 2022) includes case studies of members in a variety of advanced and consultant practice roles.

3. Advanced and consultant practice and scope of practice

This section builds on the published scope of practice for radiography (SoR 2024c) to provide more information about the considerations that advanced practitioners and consultant practitioners will need to think about to make sure that they are able to practise safely and effectively within their scope of practice.

This section is structured around four key influences on scope of practice:

- legislation
- regulation
- professional body
- service providers and employers.

An advanced practitioner or consultant practitioner thinking about their scope of practice might ask themselves the following key questions. This section aims to support members in answering these questions.

Some key questions for advanced practitioners and consultant practitioners thinking about scope of practice

Q. Do I have the skills and knowledge to carry out the role/activity safely and effectively?

Q. Have I completed any education and training necessary to equip me with the skills and knowledge to carry out the role/activity safely and effectively?

Q. Are any activities I am required to perform restricted by law (for example, prescribing) and, if so, can I undertake those activities legally?

Q. Is my employer supportive of my role and scope of practice?

Q. Are the role and scope of practice clearly defined in my job description and/or job plan?

Q. What guidance, standards, policies and procedures do I need to follow or will help me in my role?

Q. What supervision or support do I need so that I can practise safely and effectively?

Q. Do I have a professional indemnity arrangement in place that will cover the role/activity?

Source: Adapted from Health and Care Professions Council (2024a). Identifying your current scope of practice.

Legislation

There are some areas in which legislation will enable or limit scope of practice by setting out the activities that may only be performed by (specific) regulated professions. For example:

- The Ionising Radiation (Medical Exposure) Regulations 2017 (IR(ME)R) set out roles that can only be performed by registered healthcare professionals. A registered healthcare professional is defined as someone registered by a statutory professional regulator in healthcare, including the HCPC.
- The Human Medicines Regulations 2012 set out the ability of certain regulated professions to sell, supply, administer and prescribe medicines.

All advanced practitioners and consultant practitioners will need to practise within the legal, professional, ethical and governance frameworks relevant to their profession, practice and role. We have included references to some of the frameworks, standards and guidance most relevant to advanced and consultant practice in this document.

Regulation

Regulatory standards and requirements influence scope of practice by putting in place a framework for safe and ethical practice.

The HCPC does not define or limit its registrants' scope of practice. The HCPC's standards of proficiency for radiographers describe the knowledge, understanding and skills required for entry to the HCPC Register as a radiographer. They are used in pre-registration education and training, and will inform the scope of practice of radiographers, particularly in their early careers.

However, the HCPC recognises that as radiographers progress in their careers, their scope of practice will develop. Once qualified and registered, radiographers are required to confirm each time they renew their registration that they continue to meet the standards of proficiency, but only those that are relevant to their scope of practice (HCPC 2023).

Radiographers are able to undertake education and training and gain further experience to develop their scope of practice, including into advanced and consultant practice roles. The HCPC's standards of conduct, performance and ethics enable radiographers to safely develop their scope of practice (HCPC 2024b). The HCPC's primary concern is that a radiographer has the knowledge, skills and experience to be able to practise safely and effectively within their scope of practice.

HCPC standards and scope of practice

Keep within your scope of practice

3.1 You must only practise in the areas where you have the appropriate knowledge, skills and experience to meet the needs of a service user safely and effectively.

3.2 You must undertake additional training to update your knowledge, skills and experience if you wish to widen your scope of practice.

3.3 You must refer a service user to an appropriate practitioner if the care, treatment or other services they need are beyond your scope of practice. This person must hold the appropriate knowledge, skills and experience to meet the needs of the service user safely and effectively.

Source: Health and Care Professions Council (2024b). *Standards of conduct, performance and ethics*.

Professional indemnity

Advanced and consultant level practice are levels of professional practice at which practitioners are managing increased levels of complexity, uncertainty and risk.

As a result, advanced practitioners, consultant practitioners, service providers and employers may sometimes have questions about whether suitable arrangements for professional indemnity are in place.

As a legal requirement of registration with the HCPC, all radiographers are required to ensure that they have in place a professional indemnity arrangement that provides appropriate cover when they practise.

‘Appropriate cover’ means that the indemnity arrangement is relevant to the risk involved in an individual’s scope of practice so that it will be sufficient if a claim is successfully made against them.

When they apply for or renew their registration with the HCPC, radiographers are asked to declare that they have, or will have, a professional indemnity arrangement in place (HCPC 2014).

The majority of radiographers will meet the legal requirement because they are employed by the NHS and/or by another employer, where the employer indemnifies its employees for work carried out on its behalf. This includes advanced practitioners and consultant practitioners, including those in ‘non-traditional’ roles. If a radiographer undertakes self-employed or independent practice, or a combination of employed and self-employed or independent practice, they will need to ensure that they have appropriate indemnity for the whole of their practice. This includes taking out separate insurance.

Full members of the SoR benefit from professional indemnity insurance (PII). The SoR PII scheme only applies where the member has a contract of employment in place and the employer has vicarious liability for the member as an employee (SoR 2024b).

To benefit from the SoR PII scheme, members must be working within their scope of practice and in accordance with the SoR *Code of Professional Conduct* (SoR 2024a).

This means that advanced practitioner and consultant practitioner members who meet the requirements outlined above will benefit from the SoR PII scheme. This includes those working in 'non-traditional' roles for which professional registration is required by their employers.

The SoR PII scheme does not cover self-employed or independent practice, for which separate insurance cover would be required

HPC requirements for professional indemnity

- You must make sure you have a professional indemnity arrangement in place when you practise.

This could be an arrangement provided:

- » through your employer if you are employed;
- » as part of membership of a professional body, trade union or defence organisation; or
- » directly from an insurer.

Or, it could be a combination of the above.

- You must make sure that the professional indemnity arrangement you have in place provides appropriate cover. This means that the cover needs to be appropriate to the risks involved in your practice so that enough compensation will be paid if a successful claim is made against you.
- If you are employed, your employer's indemnity arrangements are very likely to provide appropriate cover for the activities that you perform as part of your job.

Source: Health and Care Professions Council (2014). *Professional indemnity and your registration*.

Professional body

As a professional body, we also play a key role in shaping scope of practice. We do this by supporting and advocating for our members and the profession and by developing frameworks, standards and guidance based on evidence and professional consensus.

The SoR is supportive of the development of advanced and consultant practice roles, including those that allow members to safely develop into new areas of practice. They build on the unique contribution of the professional workforce to health and care services, providing further opportunities for members to deliver and lead services for the benefit of patients, as well as providing further opportunities for fulfilling professional careers.

Prescribing practice guidance

The ability of certain regulated professions to sell, supply, administer and prescribe medicines, including controlled drugs, is set out in legislation. This includes the Human Medicines Regulations 2012 and the Misuse of Drugs Act 1971.

Diagnostic radiographers are able to train to become supplementary prescribers. Therapeutic radiographers are able to train to become supplementary and independent prescribers. Radiographers who have completed an HCPC-approved prescribing programme will have their entry in the HCPC Register annotated to indicate and enable their ability to prescribe.

We have published practice guidance to support the decision-making of radiographer prescribers (SoR 2023). This sets out the typical scope of practice of prescribing in radiography.

Scope of radiographer prescribing

The scope of independent prescribing practice by radiographers is:

Radiographer independent prescribers may prescribe most licensed medicines, within national and local guidelines, for any condition within the practitioner's area of expertise and competence, and within the overarching framework of the radiography scope of practice including treatment of cancer and the overarching framework of imaging and diagnosis. They may also mix medicines prior to administration and direct others to mix. Therapeutic radiographer independent prescribers can prescribe from a limited list of controlled drugs.

The scope of supplementary prescribing practice by radiographers is:

Radiographer supplementary prescribers can prescribe in partnership with a doctor (or dentist) within their scope of practice. They can prescribe most medicines, including most controlled drugs and unlicensed medicines, for any medical condition within their sphere of competence, provided that they do so under the terms of a patient-specific CMP [clinical management plan] agreed with a doctor or dentist. The CMP will be written with the patient's agreement following diagnosis of the patient's condition.

[...]

For enhanced, advanced or consultant roles that sit outside the primary scope of registered practice in an imaging or oncology environment where radiographers are required to retain their primary registration by the employer, the scope of prescribing practice should reflect the postgraduate level education, knowledge and skills to meet the requirements of the role. The radiographer must be confident that they continue to meet the HCPC *Standards of proficiency for radiographers* and be able to evidence this through their CPD.

Source: Society of Radiographers (2023). *Practice Guidance for Radiographer Independent and/or Supplementary Prescribers*.

The practice guidance (see last paragraph in the text box above) acknowledges that radiography prescribers working in 'non-traditional' roles outside the primary scope of radiography practice, including advanced practitioners and consultant practitioners, are still able to prescribe. The scope of their prescribing practice will reflect the knowledge and skills required for their role, underpinned by postgraduate-level education. They would also need to work within the policies and procedures of their employers.

Radiographer prescribers, including those in advanced and consultant practice roles, should, like any other prescriber, only prescribe medicines for conditions that fall within their scope of practice – those for which they have the knowledge, understanding and skills to do so safely and effectively.

NHS England (NHSE), in collaboration with stakeholders in the four countries of the UK, including the SoR, has published a framework that sets out the arrangements in place to ensure safe prescribing practice, outlining the important roles and responsibilities of the regulator, professional body, employer and prescriber (NHSE 2024).

This document acknowledges that there can sometimes be local variation in the medicines that prescribers are able to prescribe and encourages service providers to make full use of existing medicines and prescribing mechanisms.

The risk is that without full use of existing medicines supply routes to patients, the healthcare workforce's contribution will be hampered, and patient outcomes and experience compromised. For non-legislative barriers to be overcome, all those involved in designing and delivering patient services and care pathways that involve prescribing need to fully consider the legal requirements, regulatory and professional requirements alongside local governance, and put systems and policies in place that respond to both workforce and local population issues.

Source: NHS England (2024). *Prescribing and Support Assurance Framework*.

Service providers and employers

Service providers and employers will make their own decisions about how they wish to deliver their services and the knowledge and skills of the workforce required to deliver those services.

They will determine, in collaboration with the workforce, the content and scope of the advanced and consultant practice job roles of those they employ. They will put in place clinical governance and risk management arrangements that will influence what and how clinical care is delivered. For example, service providers will have policies in place that govern how they implement IR(ME)R.

Advanced practitioners and consultant practitioners will need to work within the policies and procedures of their employers, which are likely to evolve over time to enable advanced practitioners and consultant practitioners to practise to the full extent of their scope of practice.

There are resources published by NHS England for service providers and employers about implementing advanced and consultant practice roles within their services and workforces (NHSE undated).

4. Frequently asked questions

We have given the answers below to some frequently asked questions about advanced and consultant practice and scope of practice.

Q. I am interested in a trainee advanced practitioner position outside clinical imaging and oncology that involves assessing, treating and managing the care of patients within a frailty service. Radiographers are able to apply. If I am successful, am I able to undertake this type of role?

Yes.

Your individual scope of practice is the activities that you have the appropriate, education, training and experience to carry out safely, effectively and lawfully.

Your education and training in advanced practice will draw on your professional background as a radiographer to equip you with the knowledge and skills to practise safely and effectively in your role. Radiographers can undertake education and training to develop knowledge and skills outside the primary scope of radiography practice that allow them to undertake these types of role.

Q. I am a therapeutic radiographer and independent prescriber. Am I able to prescribe in my advanced practice/consultant practice role?

Yes.

The SoR prescribing practice guidance provides advice for radiographer prescribers about scope of practice. This includes advanced practitioners and consultant practitioners, including those in 'non-traditional' roles that require professional registration but are outside the primary scope of practice of radiography.

All radiography prescribers, including those in advanced and consultant practice roles, should only prescribe medicines for conditions that fall within their scope of practice – those for which they have appropriate knowledge, skills and experience to meet the needs of patients safely and effectively. Radiography prescribers will also need to work within the policies and procedures of service providers and employers.

Q. As an advanced or consultant practitioner, what regulatory requirements do I need to meet?

Advanced practitioners and consultant practitioners are not separately regulated. As a radiographer registered with the HCPC, you need to meet the HCPC's standards, including the *Standards of conduct, performance and ethics*, *Standards of proficiency for radiographers* and standards of continuing professional development (HCPC 2017). You also need to have a professional indemnity arrangement when you practise.

The HCPC does not define or limit its registrants' scope of practice. Radiographers must only practise within the areas where they have appropriate knowledge, skills and experience to meet the needs of patients safely and effectively.

Q. In my advanced practitioner or consultant practitioner role, I do not perform imaging examinations or deliver radiotherapy treatment. Can I still retain my registration with the HCPC?

Yes.

To remain registered, you need to continue to meet the HCPC's standards as they apply to your particular scope of practice. As with any other registrant, you need to make sure that you are able to practise safely and effectively within your scope of practice – the area or areas in which you have appropriate knowledge, skills and experience to meet the needs of patients safely and effectively.

Employers will require you to hold and maintain professional registration for advanced practitioner and consultant practitioner roles.

Q. I am an advanced practitioner working for an employer. Do I need to take out separate professional indemnity insurance?

No (unless you are also undertaking self-employed or independent practice as a radiographer).

All radiographers are legally required to have in place a professional indemnity arrangement that provides appropriate cover for their practice. The majority of radiographers, including advanced practitioners and consultant practitioners, will meet this requirement because they are employed by the NHS or by another employer who will indemnify them for the work they do on its behalf as an employee. Where a radiographer carries out self-employed or independent practice, they will need to take out separate insurance.

The SoR professional indemnity insurance (PII) scheme is a membership benefit for full members who have a contract of employment in place and the employer has vicarious liability for the member as an employee.

Q. Does the SoR professional indemnity insurance cover me in my advanced practice/consultant practice role?

The SoR professional indemnity insurance (PII) scheme is a membership benefit for full members who have a contract of employment in place and the employer has vicarious liability for the member as an employee

Members must be working within their scope of practice and in accordance with the SoR's *Code of Professional Conduct* (SoR 2024a).

Provided the above requirements are met, the SoR PII scheme will cover radiographers in advanced and consultant practice roles, including those in 'non-traditional' roles where professional registration is required.

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