



Society of Radiographers of South Africa

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Director General of Health
Department of Health
Private Bag X828
Pretoria
0001

Attention: Director: Public Entities Governance

Mihloti.mushwana@health.gov.za

Dear Sir/madam

GOVT GAZETTE 21 AUGUST 2020 (43632 NO 907): REGULATIONS DEFINING THE SCOPE OF THE PROFESSION OF RADIOGRAPHY

The above, as well as Government Gazette R717/2006 and Government Gazette R68/2009, refer.

The Society of Radiographers of South Africa (SORSA) hereby submits substantiated comments pertaining to the above inclusive of Government Gazette R717/2006 and Government Gazette R68/2009. The latter does not include amendments to Annexure 10 Government Gazette No29079 4 August 2006 thus in our comments we will refer to Annexure 10. Our comments also refer to regulations defining the scope of the profession of radiography (Government Gazette No 5349, 3 December 1976 as amended).

The proposed regulations do not adequately address the scope of the profession for the following reasons.

- The profession of radiography is constantly adopting the technological advances and more recently the impact of the 4th industrial revolution especially artificial intelligence (AI) and machine learning. The importance of AI has been covered in CPD events. For example, Prof Marwala from UJ was a keynote speaker on AI at the imaging congress in 2019 in Cape Town. Globally the profession of radiography has been making use of AI. Page 8 in the August 2020 Newsletter of the Professional Board of Radiography and Clinical Technology spells out the significant rise of AI in the practice of the profession of radiography. SORSA strongly recommends that this should be incorporated in the final regulations of the scope of profession (hereafter SoP).

- Patient care is in the current regulations defining the SoP of radiography in the referred to Gazette No 5349. Patient care in the proposed regulations is only listed in 2 (e): Radiation Therapy. Patient care is pivotal for all radiographers and not only those practicing radiation therapy. We draw attention to the contradictions with respect to patient care. In the August 2020 Newsletter of the Professional Board of Radiography and Clinical Technology, pages 13 to 15, it is indicated that certain statements were removed from the regulations defining the scope of the profession of radiography on the recommendation of the board's advocate. It further reads that these statements should be included in rules of conduct documents. If so then why do the proposed regulations only include patient care in 2 (e)? Furthermore we cannot find patient care in the above referred to in Government Gazette R717/2006. We recommend that proposed regulations retain patient care as is in the current SoP referred to above. SORSA is of the view that patient care is a vital part of all radiographers (diagnostic, radiation therapy, nuclear medicine, and ultrasound) practice.

➤ Diagnostic

- 1 (a) refers: "other non -ionising modalities for Diagnostic purposes including but not limited to: (i) X -rays.....; (ii) Magnetic Resonance Imaging; and (iii) Mammography.....". We welcome this broad statement as it then would include ultrasound which is a non-ionising modality. We are aware that there is a need for a diagnostic radiographer to also provide some ultrasound services in primary healthcare facilities.
- The proposed regulations for Diagnostic (1) refer. It is of concern that several relevant aspects of the current scope in Gazette No 5349, 3 December 1976 as amended have been omitted in the proposed regulations. Diagnostic radiographers are responsible for a wide range of patient-oriented tasks to ensure that their (patients) needs are addressed appropriately, including protection of their records and using equipment, professional knowledge and technology to the benefit of patients and other stakeholders. Of importance is equipment and quality assurance which have been omitted in the proposed regulations. The omission of quality assurance in the proposed regulations may have legal ramifications should a patient suffer an adverse event during a diagnostic procedure.
- 1 (b) refers. The meaning of basic is unclear. Furthermore would basic also pertain to 1 (c) in Annexure 10? 1 (c) in Annexure 10 states: shall not interpret radiographical investigations, report thereon or furnish information in regard to any work performed by him or her in his or her profession to any person other than a practitioner approved by the board at whose request such work was undertake. 1 (c) does not state basic. Recommend omit 'basic'.

➤ Radiation therapy

- 2 (c) refers. The wording is confusing because the delineation of the tumour volumes and organs at risk is the responsibility of the oncologists. Dosimetric treatment planning is done by radiotherapists or medical physicists.
- 2 (g) refers. Note that according to the Dept of Health the license holder is the Radiation Protection Officer under the Group IV license.

➤ Nuclear medicine

3 (f) refers. Hybrid imaging is "fusion of two (or more) imaging modalities to form a new technique. By combining the innate advantages of the fused imaging technologies synergistically, usually a new and more powerful modality comes into being".¹ Globally hybrid imaging is constantly advancing and , for example, includes PET-CT, SPECT-CT, MRI-PET, MRI-SPECT, ultrasound and MRI, ultrasound and CT, and MRI and CT. Furthermore fusing imaging is used for treatment of patients with cancer. The significance of hybrid imaging is regularly underscored at CPD events and was a theme at the 2017 Imaging congress held in Durban. SORSA thus recommends that In keeping with the 4th industrial revolution, fusion (hybrid) imaging (with training) should apply to diagnostic, radiation therapy, nuclear medicine and ultrasound.

- Ultrasound
See Diagnostic bullet one above.

RECOMMENDATION

1. The various substantiated comments above should be addressed and the proposed regulations should be revised.
2. Proposed regulations for the SoP should include advances with respect to the 4th industrial revolution.

Yours sincerely



A Ramkhelawan

National president

Reference

1. Bell DL, R Pflieger et al. Hybrid imaging. [Cited 2020 November 18]. Available from : <https://radiopaedia.org/articles/hybrid-imaging-1>