Health Information and Quality Authority

An tÚdarás Um Fhaisnéis agus Cáilíocht Sláinte

Monitoring and Regulation of Healthcare Services

Statement of outcomes on engagement and consultation on

National procedures for clinical audit of radiological procedures involving medical exposure to ionising radiation

November 2023

Safer Better Care

About the Health Information and Quality Authority

The Health Information and Quality Authority (HIQA) is an independent statutory authority established to promote safety and quality in the provision of health and social care services for the benefit of the health and welfare of the public.

HIQA's mandate to date extends across a wide range of public, private and voluntary sector services. Reporting to the Minister for Health and engaging with the Minister for Children, Equality, Disability, Integration and Youth, HIQA has responsibility for the following:

- **Setting standards for health and social care services** — Developing person-centred standards and guidance, based on evidence and international best practice, for health and social care services in Ireland.
- **Regulating social care services** — The Chief Inspector within HIQA is responsible for registering and inspecting residential services for older people and people with a disability, and children's special care units.
- **Regulating health services** — Regulating medical exposure to ionising radiation.
- **Monitoring services** — Monitoring the safety and quality of health services and children's social services, and investigating as necessary serious concerns about the health and welfare of people who use these services.
- **Health technology assessment** — Evaluating the clinical and cost-effectiveness of health programmes, policies, medicines, medical equipment, diagnostic and surgical techniques, health promotion and protection activities, and providing advice to enable the best use of resources and the best outcomes for people who use our health service.
- **Health information** — Advising on the efficient and secure collection and sharing of health information, setting standards, evaluating information resources and publishing information on the delivery and performance of Ireland's health and social care services.
- **National Care Experience Programme** — Carrying out national service-user experience surveys across a range of health services, in conjunction with the Department of Health and the HSE.

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Introduction and background

Since 2019, HIQA is responsible for regulating medical exposure to ionising radiation in Ireland. HIQA is responsible for establishing national procedures for clinical audit of radiological procedures involving medical exposure to ionising radiation since October 2022.

Clinical audit is a quality improvement tool central to providing good care and service to patients and people who use the services.* The purpose of clinical audit is to systematically review care and or services against agreed standards to ensure that the standards are being met.

Extensive stakeholder engagement was carried out to develop the national procedures for clinical audit of radiological procedures involving medical exposure to ionising radiation.

Stakeholder engagement was completed in three stages:

- scoping consultation
- targeted focused consultation
- public consultation.

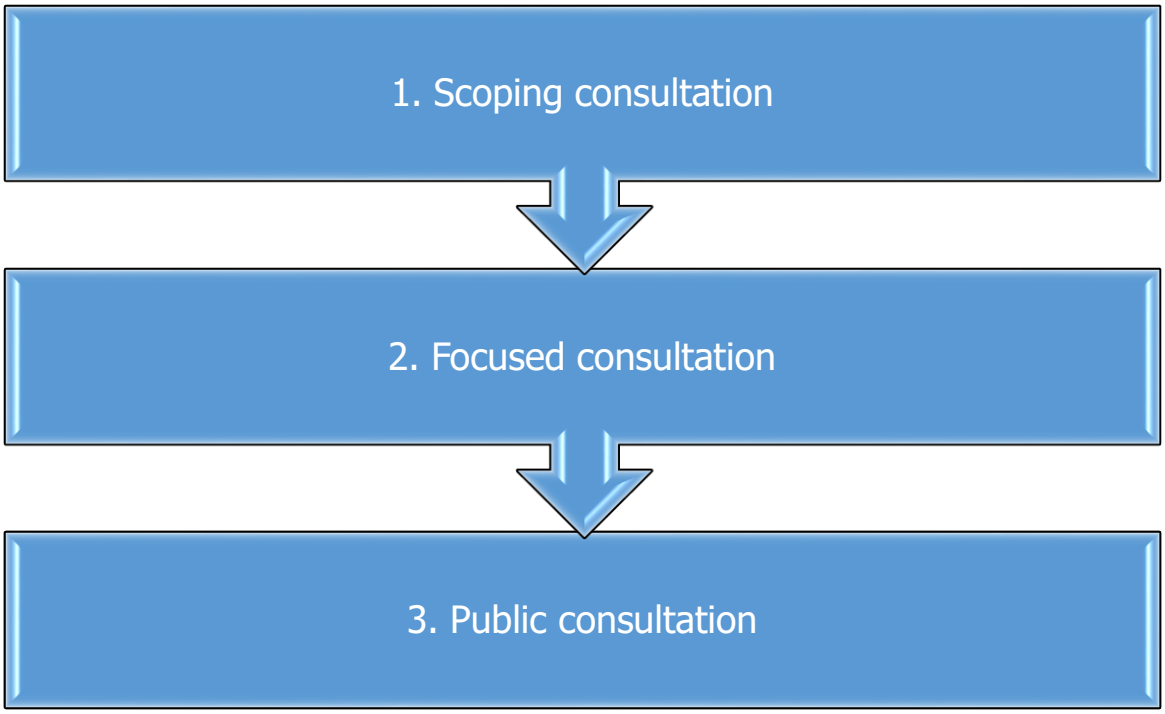
* In addition to patients, people who use the service include clients, comforters and carers.

This statement of outcomes presents the information gathered from the three stages of stakeholder engagement and how this information was used to inform the development of the national procedures.

Overview of the consultation process

A stakeholder[†] engagement campaign (Figure 1) was carried out in three stages with relevant stakeholders. Details of these bodies and organisations informed of this campaign are contained in **Error! Reference source not found.** and is also listed in the *National procedures for clinical audit of radiological procedures involving medical exposure to ionising radiation* document on www.hiqa.ie.

Figure 1. Stages of the stakeholder engagement campaign



Scoping consultation

This engagement campaign initially included a scoping consultation with stakeholders including professional and regulatory bodies.The scoping consultation aimed to gather information on clinical audit available from professionals working in the area of medical ionising radiation. In addition, an extensive review of the existing scientific literature was also carried out.

[†] A stakeholder is either an individual, group or organisation who can affect or is affected by a project, initiative, policy or organisation.

During the engagement campaign, various themes emerged from discussions with stakeholders that assisted in forming the principles and essential criteria for clinical audit as outlined in the national procedures. Please see Appendix B for more information regarding feedback from stakeholders.

Focussed consultation

The information gathered from the scoping consultation and a review of the literature was collated, analysed and used to establish the draft national procedures.

A targeted focused consultation was then carried out with stakeholders in relation to the draft national procedures. Stakeholders were asked for general feedback and to consider the following questions:

- are the principles and essential criteria for clinical audit clear?
- are the sample templates useful?
- are appendices clear?
- are there additional resources that would be useful to add?
- is it clear what undertakings need to have in place to be in compliance?

The general consensus from the targeted focused consultation was that the document, its templates and appendices were easy to understand and useful for undertakings and staff working in the area of ionising radiation.

Public consultation

Feedback from the targeted consultation was incorporated into a draft document. This draft was made available for a six week public consultation from 19 June to 31 July 2023. A social media campaign was used to alert relevant stakeholders.

The public consultation feedback form can be found in Appendix C of this document. The feedback form allowed for general and specific feedback. Questions asked through the public consultation included:

- is it clear in this document what undertakings (providers) need to have in place to be compliant with the requirements for clinical audit in the regulations?
- is the framework (principles and essential criteria) understandable and clear?

Various social media channels were used to alert stakeholders about the public consultation during the 6 week period.

Feedback from the public consultation process

The general consensus from the public consultation was that the document was easy to follow and clear what undertakings need to have in place to be compliant with the regulations. The templates and appendices were also identified as useful for staff in the relevant services. Suggestions for the inclusion of additional resources in the document were provided and incorporated in to the document. An updated literature search was carried out on 9 August 2023 following the public consultation stage.

Feedback through the consultation process was relatively limited and potentially points to the benefit of the extensive campaign which was conducted before drafting the document.

Specific points raised in the public consultation included:

1. **Feedback:** The document is generic, different disciplines should be addressed separately.
   Response: The national procedures are applicable across all service types with different complexities and levels of radiological risk. The feedback from the consultation process identified the importance of having a principle based document which could be applied in any setting. Individual appendices for each setting are provided to aid undertakings to apply the national procedures in their setting. Further resources are also included in these appendices.

2. **Feedback:** It could be clearer in the document that all health professionals should be involved in every stage of clinical audit in a collaborative way.
   Response: This feedback was addressed by strengthening wording and emphasising this point in the section of national procedures related to the practical implementation of clinical audit.

3. **Feedback:** A suggestion was made about advocating for a protected clinical audit role for a specific discipline
   Response: Clinical audit should be multidisciplinary, however, advocating for specific discipline-based roles for clinical audit is outside the remit of national procedures. It is the undertaking's responsibility to identify the staff that are best placed to participate in clinical audit aligned to their own clinical audit strategy.

Conclusion and next steps

Initial stakeholder engagement and literature review contributed to the development of the draft national procedures.

Both the targeted focused consultation feedback and public consultation submissions were reviewed and considered and the draft document was revised based on the feedback.

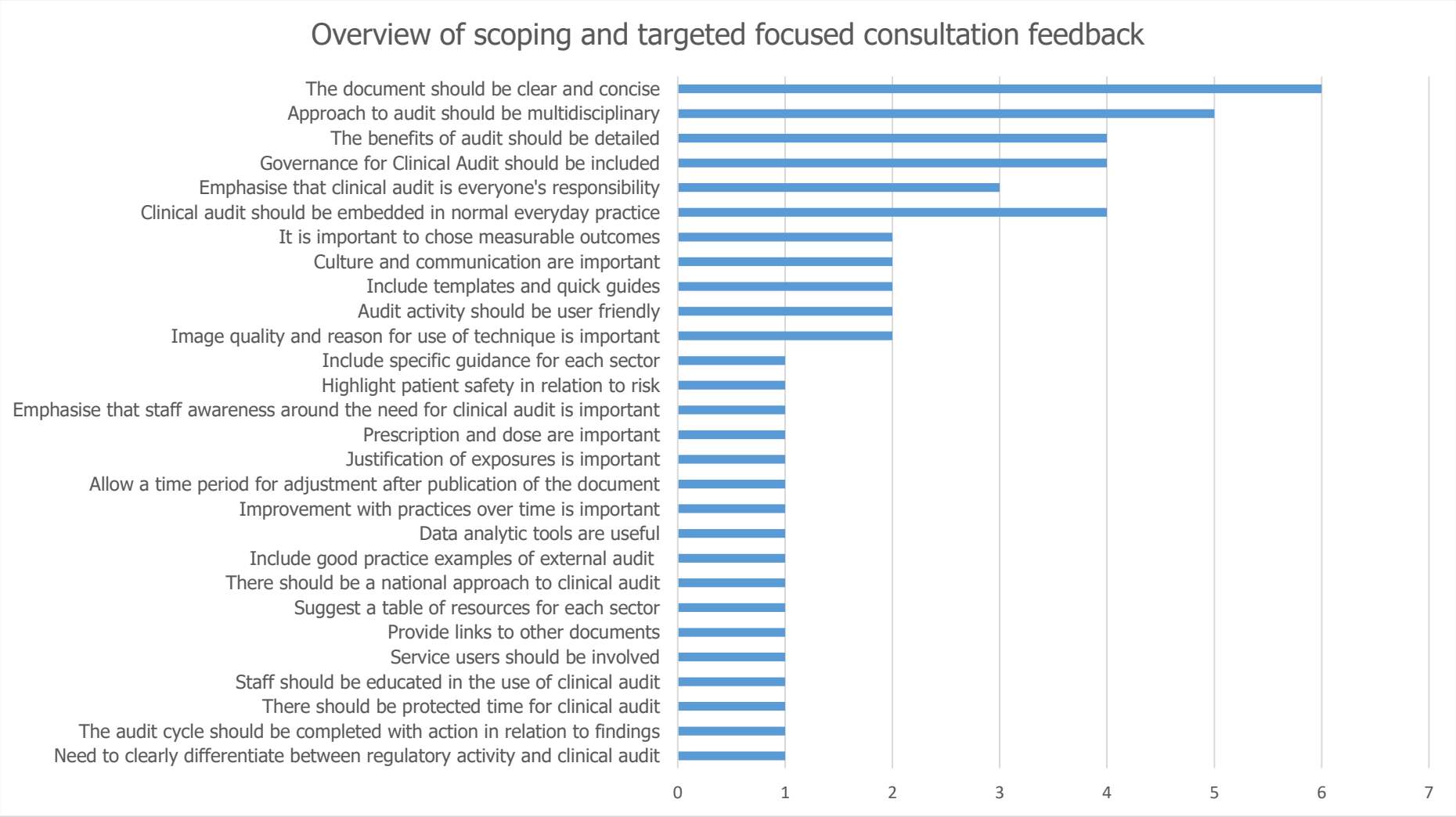
National procedures for clinical audit of radiological procedures involving medical exposure to ionising radiation was approved by John Tuffy, Head of Programme for Healthcare services, in November 2023 and published on HIQA's website at www.hiqa.ie where it can be accessed.

Appendix A: Engagement with key affected parties and stakeholders

As part of the consultation process to develop these guidelines, engagement with the following key stakeholders and affected parties took place:

Key affected parties and stakeholders
▪ Assistant National Oral Health Lead HSE ▪ CORU - Ireland's multi-profession health regulator ▪ Dental Council of Ireland ▪ Department of Health ▪ European regulators of medical ionising radiation ▪ European Society of Radiology (ESR) - President ▪ Irish Association of Physicists in Medicine (IAPM) ▪ Irish College of Physicists in Medicine (ICPM) ▪ Irish Dental Association (IDA) ▪ Irish Institute of Radiographers and Radiation Therapists (IIRRT) ▪ Irish Medical Council ▪ National Radiation Protection Committee ▪ Nursing and Midwifery Board of Ireland (NMBI) ▪ Private Hospitals Association (PHA) ▪ RCSI Faculty of Radiologists and Radiation Oncologists ▪ Voluntary Hospitals Forum

Appendix B: Themes from stakeholder engagement



Appendix C: Public consultation feedback form

National procedures for clinical audit of radiological procedures involving medical exposure to ionising radiation

For public consultation

Consultation Feedback Form

Your feedback is very important to us. We welcome comments you would like to make.

When commenting on a specific section of this document, it would help if you can identify which element you are commenting on and the relevant page number.

The closing date for consultation is 5pm on 31 July 2023

You may email a completed form to us at radiationprotection@hiqa.ie. You may also complete and submit your feedback online at https://bit.ly/3J9uGLA

About you

Name	
You or your organisation's country	
Today's Date	

General Information and Questions

You may provide us with general comments or feedback on the specific questions (see questions that follow).

Part 1

Are you replying in a personal capacity or on behalf of an institution or organisation?

☐ Personal capacity

☐ On behalf of an institution *Please name*

☐ On behalf of an organisation *Please name*

Part 2

Please outline any general or specific feedback on the document. In your response, where applicable, please specify the section (or page number) to which you are referring.

Please comment

Is it clear in this document what undertakings (providers) need to have in place to be compliant with the requirements for clinical audit in the regulations?

☐ Yes

☐ Somewhat

☐ No

Please provide reasons for your answer

Is the framework (principles and essential criteria) understandable and clear?

☐ Yes

☐ Somewhat

☐ No

Please provide reasons for your answer

Part 3

Please outline any issues with the clarity or presentation of the document. In your response, where applicable, please specify the section to which you are referring.

Please comment

Thank you for taking the time to give us your views.

After the closing date, we will assess all feedback and use it to finalise our document. The final document and the Statement of Outcomes (a summary of the responses) will be published on http://www.hiqa.ie.
We do not intend to publish individual personal information in the Statement of Outcomes. However we may include information about the organisations and institutions that have responded.

*By ticking 'I agree' you are consenting to having your response and information about your organisation or institution included in our published Statement of Outcomes.

☐ I agree

☐ I do not agree

Please return your form to us by email or post:

radiationprotection@hiqa.ie

Radiation Protection

Health Information and Quality Authority

Unit 1301 | City Gate | Mahon | Cork | T12 Y2XT

or complete it online at: **https://bit.ly/3J9uGLA**

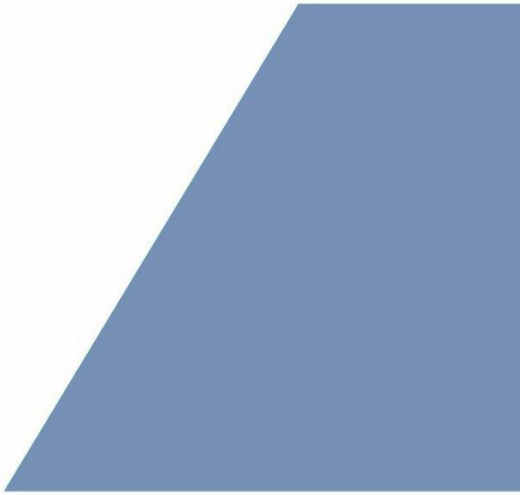
If you have any questions you can contact the consultation team emailing radiationprotection@hiqa.ie.

Please return your form to us online, by email or post before

5pm on 31 July 2023

Please note that the Authority is subject to the Freedom of Information Acts and the statutory Code of Practice regarding FOI.

For that reason, it would be helpful if you could explain to us if you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.



Published by the Health Information and Quality Authority (HIQA).

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