



## Licensing of medical practitioners to use X-ray equipment

Directorate: Radiation Control, Department of Health

Inspectors of the Department of Health (DOH) have confirmed the concerns of the Medical and Dental Professions Board (MDB) regarding a lack of knowledge pertaining to the impact of ionising radiation on the public, over-exposure, misdiagnosis and inappropriate treatment of patients by general medical practitioners (GPs) using X-ray equipment

In the early 1980s the DOH questioned the training of GPs to perform diagnostic X-ray examinations. This was not resolved and the DOH continued issuing licences to GPs for the use of X-ray equipment for diagnostic purposes.

The scope of medical practitioners is wide and overlaps with the scopes of other professions, including radiography. Recent reports confirmed that owing to the limited course content in respect of radiography in their undergraduate education and training, medical practitioners (non-radiologists) could not perform specific professional acts that fell within the scope of radiography, except in an emergency. These include the taking and interpretation of X-ray films. Further education and training in radiography, to be developed and approved by the Professional Board for Radiography and Clinical Technology (PBR & CT), in collaboration with the MDB, is required.

In December 2003 the Executive Committee of the MDB confirmed that only practitioners with adequate education, training and experience in the field of radiography/radiology should be allowed to own and/or use X-ray equipment. The Department of Radiation Control has therefore adopted the following position since 1 June 2004:

Any practitioner or person wishing to use and/or own medical X-ray equipment must have received proper, accredited education and training in the correct and safe use of such equipment as determined by the MDB and the PBR & CT.

These professional boards are currently working on principles to *inter alia* define adequate education, training and experience. Implementation of this policy relating to further education and training to be completed by non-radiologists

*Corresponding author: S Nel (nels@health.gov.za)*

currently in possession of licences to use X-ray equipment will only be effected once the course has been finalised, and guidelines pertaining to the use and ownership have been refined and approved by the Health Professions Council of South Africa (HPCSA). Such licence holders will be allowed to complete the course within a given time.

In terms of current legislation the Directorate: Radiation Control (DRC) is authorised to withdraw licences and seal equipment if practitioners fail to meet the licence conditions.

In terms of the Regulations Relating to the Control of Electronic Products, prospective users of X-ray equipment are also required to submit applications for user licences at least 90 days before the intended commissioning date. Suppliers may not install X-ray equipment unless the client is in possession of a valid licence for the use thereof. Licences are required for the possession (installation, storage, etc.) of X-ray equipment, irrespective of whether such equipment is being used or not.

The DRC does not anticipate any problems in this regard since prospective users would have received sufficient notice of unsuccessful applications.

Since a licence is issued to a specific person or hospital for a specific machine (make, model and serial number) to be used at a specific location, it may not be transferred from one party to another without the formal approval of the DRC.

Any person acting in contravention of the stipulations above could be prosecuted in terms of the relevant legislation.

Please feel free to contact the DRC or the HPCSA for further information.

Department of Health  
Directorate: Radiation Control  
Private Bag X62  
Bellville  
7535  
Tel. 021 948-6162  
Fax: 021 946-1589  
E-mail: Susan Nel  
Web: <http://www.doh.gov.za/departments/radiation/01.htm>