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European Commission
B-1049
Brussels
Belgium

Utrecht, 31st of March 2009

Re: Green paper on the European workforce for health (COM(2008)725 final)

Dear Sirs,

The EFRS came across the Green Paper dated December 2008 rather late and it was not possible to consult our 29 member societies to gather information on their national situation. The reaction formulated below is therefore based on the experience and knowledge of the EFRS Board in European matters with regard to the radiographer profession.

Annex you find a definition of our health care profession, the list of our member societies and the national titles of the profession. The radiography profession regroups specialised staff working in medical imaging and radiotherapy. It is a small group compared to nursing and relatively unknown to the public. Through their national societies about 80.000 radiographers are represented by the EFRS.

Remarks page by page:

Page 5, second paragraph. EFRS strongly supports all networking activities at the European level aimed at sharing good practice. The Federation will be ready to participate in any EU initiative or project with this aim, while respecting the national responsibilities for the health services and care.

Page 7 Influencing factors. EFRS suggest adding “innovative work practices” for health care workers. This means role and career development to make professions more interesting both in content and financially. Innovation could also mean the creation of more levels within a profession with the possibility to “grow”. The additional advantages of differentiation are a broader market for recruitment from secondary education levels and probably less drop off because of a better career perspective.

Page 8 Training. Mentioning health care professions in the document as “doctors, nurses and (non specified) other staff” gives the impression that the main focus of all activities is on those biggest groups.

Other staff could also mean the non-medical staff needed to run a health care institution. To have all health care workers involved we would prefer to read: doctors, nurses and all other

professions allied to health care” or even better “health care workforce” without any specification.

Influencing factors. We fully endorse your statement on CPD. Especially for smaller professional groups EU support for the organisation of CPD activities at a European level would be appreciated, accompanied by language training possibilities and (the development of a European accreditation system for CPD.

Providing management training for health professionals should to our opinion be focused on developing leadership skills, possibly leading up to management. Because management is one of the few career perspectives in health care, many are aiming in this direction, but once assigned in management they are often lost for the patient care. Another possibility is to attract professional managers from outside health care and in the same time to improve the career perspectives within the content of the health care professions.

To set up an EU mechanism (observatory) on the health workforce is primordial and research in this area should be given priority above everything. As you state under 4.6. there now is a complete lack of up-to-date, comparable data and information even at the national level. All policies and strategies that are set up for health care in Europe and nationally are now based on assumptions or very limited and incomplete research and databases.

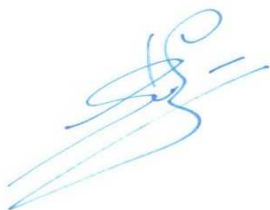
Page 5 Impact of new technology and influencing factors. EFRS agrees with your statement that new technology strongly influences health care. This can work out very positively, but on the other hand the implementation of such technologies needs a lot of attention to make the best use of it. Acquisition of high tech equipment and every change in soft ware should always go with proper training. We agree with all listed influencing factors.

Page 14 Influencing factors 1. Encouraging entrepreneurship and competition in health could be a way forward to create efficiency, but to our opinion disparity in care for patients should be avoided at all times.

Influencing factors 2. EFRS supports your suggestion to make better mo use of the support offered by structural funds. On the other hand we know that the complicated procedures for application and the time consuming paperwork related to such funding restrain organisations to apply.

Thank you for the opportunity to respond to this document.

Best regards,



On behalf of the EFRS Board

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Definition of a Radiographer:

Radiographers are responsible for the patients' physical and psychosocial well being prior to, during and following examinations or therapy.

Diagnostic radiographers are responsible to perform safe and accurate imaging examinations, using a wide range of sophisticated equipment and techniques. In most European countries these techniques not only include the traditional use of X-rays, but also:

- high frequency sound = Ultrasound
- strong magnetic fields = Magnetic Resonance Imaging (MRI)
- radioactive tracers = Nuclear Medicine

Therapeutic radiographers are responsible for the preparation and performance of safe and accurate high-energy radiation treatments, using a wide range of sophisticated equipment and techniques, such as:

- simulation with X-rays or magnetic fields, to target the area to be treated.
- computer planning to produce a plan of the dose distribution across the area to be treated, based on the simulation
- the production of individual immobilization or beam attenuation devices
- irradiation of the tumour with external beams, or with small radio-active sources placed on or in tumours (Brachytherapy)

Annex 2

EFRS member societies 2009

1	Verband der Radiologietechnologinnen Österreichs
2	Medical Radiological Technicians of Belgium MRTB
3	Vereniging van Medisch Beeldvormers VMBV – Belgium
4	Pan Cyprian society of Radiographers - Cyprus
5	Croatian society of Engineers of Medical Radiography
6	Společnost radiologických asistentů České republiky SRLA
7	Foreningen af Radiografer i Danmark
8	Eesti Radioloogiatehnikute Ühing - Estonia
9	Suomen Röntgenhoitajaliitto ry - Finland
10	Association Française du Personnel Paramédical d'Electroradiologie AFPP
11	Deutscher Verband Technischer Assistenten in der Medizin DVTA
12	Panhellenic Society of Radiotechnologists – Greece
13	Greek Society of TEI's Medical Radiological Technologists STRAEPT
14	Magyar Radiológus Asszisztensek Egyesülete M.R.A.E. – Hungary
15	Icelandic Society of Radiographers
16	Federazione Nazionale Collegi Professionali Tecnici Sanitari di Radiologia Medica NCTRM – Italy
17	Latvian Society of Radiographers
18	Lithuanian radiographers association
19	Society of Medical Radiographers S.R.M. – Malta
20	Nederlandse Vereniging Medische Beeldvorming en Radiotherapie NVMBR – Netherlands
21	Norsk Radiografforbund – Norway
22	Associação Portuguesa dos Técnicos de Radiologia, Radioterapia e Medicina Nuclear ATARP
23	Udruženje radioloških tehničara i tehničara nuklearne medicine Srbije
24	Spoločnosť radiologických asistentov Slovenskej republiky
25	Društvo radioloških inženirjev Slovenije
26	Asociación Española de Tecnicos en Radiologia
27	Svensk Förening för Röntgensjuksköterskor – Sweden
28	Schweizerische Vereinigung der Fachleute für medizinisch technische Radiologie SVMTRA
29	Society and College of Radiographers – UK

Annex 3

List of national titles

	Title registered by law
Austria	Radiologietechnologin/Radiologietechnologe
Belgium	Medisch Beeldvormer (NL) Technologue en imagerie medicale (FR)
Croatia	Medical Radiology Engineer
Cyprus	Aktinografos diagnostikis (diagnostic radiographer) Aktinografos therapeias (therapy radiographer) Technologos aktinologos (radiologic technologist) qualified from TEI Athens combined course
Czech Republic	Radiologicky technik Radiologicky asistent
Denmark	Radiograf
Finland	Röntgenhoitaja Röntgenskotare
France	Manipulateur d'electroradiologie medicale
Germany	Medizinisch-technische Radiologieassistentin Medizinisch-technische Radiologieassistent
Greece	Technologos radiologias – aktinologias X-ray machine worker
Hungary	Röntgen Asszisztens
Iceland	Geislafræoingur
Italy	Tecnico sanitario di radiologia medica
Lithuania	Radiologijos technologas
Malta	Radiographer
Netherlands	Radiodiagnostisch laborant Radiotherapeutisch laborant Medische Beeldvormings- en Bestralingsdeskundige (MBB to be registered soon)
Norway	Radiograf
Portugal	Tehcnico de radiologia Tecnico de radiotherapia
Serbia	Radioloških tehničara Tehničara nuklearne medicine
Slovakia	Radiologicky asistent
Slovenia	Diplomirani radioloski inzenir
Switzerland	Fachperson für medizinisch technische Radiologie Techniciens en radiologie médicale Tecnici di radiologia medica
Spain	Tecnico especialista de radiodiagnostico Tecnico especialista de radiotherapia
Sweden	Röntgensjukskoterska
United Kingdom	Radiographer

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