



The Society for Radiological Protection

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Dear Tim

Review of the HSE Statement on Radiation Protection Advisers Consultation Document Response from the Society for Radiological Protection

SRP has carried out a consultation exercise amongst its members and this response takes account of the views of its members. The summary of the response was discussed at the SRP Council meeting on the 19th September 2005 and constitutes the Society's response to the HSE Consultation exercise.

As a fundamental SRP strongly agrees with the view that RPAs advise not only on compliance with IRR99 but also more widely on radiation protection issues arising in the workplace and that this forms an important part of the provision of effective safety management systems.

SRP can appreciate that the HSE requirements in this document should not stray into the area of "suitability", this is an issue that should nevertheless be addressed by HSE and the RP profession. The legal duty in IRR99 Reg 13 clearly lies with the radiation employer to consult a suitable RPA. What is meant by suitable can be difficult for the radiation employer to determine. Firstly, for many radiation employers work with ionising radiation is not their main undertaking. They may have difficulty in being able to assess the suitability of a prospective RPA as described in ACOP par. 216. Secondly there will be employers that deal with perhaps only direct radiation sources and will have limited knowledge of other areas of radiation protection. There is a clear need for further guidance elsewhere from HSE to (radiation) employers to assist them in forming a view in accordance with ACOP par. 216.

The approach to re-certification should be based, as at present, on either a new submission or evidence of CPD. The requirement for appointment as an RPA should be consistent across both routes; it is not a requirement for a new submission, so shouldn't be for Continuous Professional Development (CPD) renewal. Greater consistency is needed to avoid the circumstances where an individual holding a valid certificate may not have

been in a position to be appointed as an RPA, yet has been meticulous in keeping up to date with respect to CPD.

The issue of an individual RPA operating within an RPA Body needs clarification. It is not the individual who is named in the appointment, but the RPA Body. Under these circumstances how is “suitability” assessed? Is it the RPA Body or the individuals which form part of the RPA Body. Again this raises issues about CPD and future appointments if they, for example, left the RPA Body.

The detailed response is given in attachment 1.

If you require any further clarification , please do not hesitate to contact me.

Yours sincerely

Sheila Liddle
SRP Legislation and Standards Topic Group Secretary

SRP response to the Review of the HSE Statement on Radiation Protection Advisers Consultation Document.

HSE Question	Response from SRP
<p>Question 1.</p> <p>To make the Statement more user friendly HSE has prepared a set of definitions, clarifying the role of the RPA, core competence, suitability, the different types of qualified experts in the UK, etc. Is this approach appropriate and are there any other definitions that we should include?</p>	<p>SRP agrees that the definitions are helpful, but should be consistent with those in IRR99. The definition of “Role of the RPA” should explain the inter-relationship with other legislations, e.g. RSA93 and REPPIR.</p>
<p>Question 2.</p> <p>HSE believes that RPAs advise not only on compliance with the IRR99 but also more widely on radiation protection issues in the workplace. What are your views?</p>	<p>SRP strongly agrees with the view that RPAs advise more widely on radiation protection issues in the workplace. The view is that RPAs must consider legislation and radiation protection issues beyond those covered by IRR99 to ensure best practice. Regulatory compliance may be assured by IRR99, but compliance with best practice is not. However compliance with best practice will result in regulatory compliance.</p>
<p>Question 3.</p> <p>If RPAs do advise on radiation protection as well as on compliance with the IRR99, what does the term ‘radiation protection’ mean in the context of this statement? Should we define radiation protection as the topics in Annex 3 (basic syllabus)? or should the definition of radiation protection be broader than this or more limited than this?</p>	<p>SRP supports the general principle of defining “radiation protection” and that it would be of value. Members would like the definition to be broader and not restricted to the topics in Annex 3.</p>
<p>Question 4.</p> <p>There has been some confusion about the two aspects of the role of the RPA that are being addressed by the Statement i.e. to advise an employer on radiation protection issues in the workplace as well as on compliance with the IRR99. Does the draft revised text above clarify the situation?</p>	<p>SRP agrees that the revised text clarifies the situation, but could be further improved. The EA qualified expert falls outside the scope of the Statement and is a potential for confusion. This should be included as a point of clarity at the end of the section rather than where it currently appears in the text.</p>
<p>Question 5.</p> <p>The level 4 N/SVQ in radiation protection has had a very low uptake. So far as HSE is aware, only one individual has been awarded a level 4 N/SVQ in radiation</p>	<p>SRP agrees that although there are mixed feelings about this route, it should be retained. Lack of take-up was as a result of lack of publicity and the availability of centres to support it. It needs to be supported by academic institutions and revised to ensure its current relevance to the revised HSE Statement.</p>

<p>protection over the last five years. We would welcome your views on the continued usefulness of the N/SVQ route.</p>	
<p>Question 6.</p> <p>The main proposed change to Paragraph 3, Part I, Annex 1 is that the term ‘practical radiation protection experience’ in the current Statement has been deleted since it was vague and difficult to define. In its place, four alternatives are set out below to provide a range of positions that could be used to clarify the expertise issues involved in the certification process. These range from, at one end of the scale, the position that ‘education only or training only’ would be sufficient to demonstrate core competence to, at the other end of the scale, HSE requiring candidates to have ‘practical experience’ for the six DU requirements in the basic syllabus. HSE would welcome comments from consultees on their preferred option.</p>	<p>The consensus is that RPAs should have practical experience, in at least the 6 DU areas. The options preferred are those in 3 and 4. Practical experience is an important factor enabling the provision of good, sound RPA advice. Practical experience should be demonstrable and will provide the RPA with the necessary skills to communicate and deal with problems in the workplace. The RPA will not be adequately equipped for dealing with workplace issues solely by studying in the classroom. Guidance from HSE on what they consider “practical experience” to mean would be useful.</p>
<p>Question 7.</p> <p>Alternatives 2, 3 and 4 refer to candidates either being required to or likely to need practical experience for the six DU elements of the basic syllabus. HSE would welcome comments as to whether it is practicable to require ‘practical experience’ for each of these six DU elements of the basic syllabus. If so, how can a candidate demonstrate this to the satisfaction of an Assessing Body?</p>	<p>SRP agrees that a prospective RPA should have a reasonable level of practical experience gained in the workplace. It is reasonable to expect the candidate to provide direct evidence for the 6 DU topics, this could be in the form of notes, reports letters or e-mails to the employer. This practical experience would normally be based on direct workplace experiences, although some evidence derived from simulation exercises should be acceptable.</p>
<p>Question 8.</p> <p>HSE currently requires that RPAs must have detailed understanding of six elements of this basic syllabus. Is that about right, or should there be more elements where DU is required or conversely, should there be less?</p>	<p>The general view is that practical experience in the 6 DU areas is necessary. There are suggestions that further elements should be added, including monitoring and measurement, instrumentation, emergency procedures and contingency planning. Guidance is needed for those with difficulty in achieving the necessary practical experience, in terms of what constitutes practical experience and the level of detail required.</p>
<p>Question 9.</p> <p>A significant issue here is whether or not an RPA has been appointed, by a radiation employer under IRR99, at some stage in the last five years prior to recertification. Should this be reflected in the renewal process?</p>	<p>It is considered irrelevant whether or not an RPA was appointed in the last five years. The important issue is that the RPA has maintained their knowledge and kept up-to date to maintain their core competence. Re-certification should be based on either a new submission or evidence of continuing professional development.</p> <p>A number of RPAs work for an RPA body and as</p>

	<p>such the company is appointed, not the individual. There are also those staff who have meticulously kept up-to date but have been on secondment or a career break or maternity/paternity leave. This needs to be recognised when re-certification is required.</p>
<p>Question 10.</p> <p>Another issue, related to the first issue above, is whether experience (of providing RPA advice) should be made mandatory on recertification?</p>	<p>The general view is that experience of providing RPA advice is very desirable for re-certification, but not necessarily mandatory.</p>
<p>Question 11.</p> <p>Paragraphs 8 and 9 refer to suitability, even though they do clarify that HSE's recognition of Assessing Bodies is restricted to 'core competence'. Are these paragraphs necessary or should they be deleted?</p>	<p>The general view is that Para. 8 could be deleted, but not Para. 9 as this is believed to be helpful.</p> <p>Employers need help to clarify that "suitability" is a further step in appointing an RPA who is appropriate for their business and will be glad of any guidance and advice in this task.</p>
<p>Question 12.</p> <p>Paragraph 6 refers to suitability, even though it does clarify that an Assessing Body's statement of RPA recognition relates to core competence only and must stand alone. Is this paragraph necessary or should it be deleted?</p>	<p>The paragraph should be retained to clarify the issue of what certification represents to an RPA and radiation employer.</p>
<p>Question 13.</p> <p>Assessing Bodies have requested that they be given the option to extend an individual RPA's certificate by up to six months, instead of three months. Is this request reasonable?</p>	<p>There are no strong views on this matter, however it is important that timescales should be set with an awareness that a delayed renewal may result in potential serious consequences for an individual in terms of loss of earning or collapse of a small company/individual worker.</p>
<p>Question 14.</p> <p>HSE's guidance on the requirements for Assessing Bodies requires that two of the assessors must be certificated RPAs. Should this requirement be kept under the proposed new arrangements?</p>	<p>The response from members was mixed . Clearly the requirements should be that assessors have "considerable experience in the field of radiation protection", however whether they need to be RPAs in their own right is debatable. There are many experienced radiation professionals who operate in areas where a certificate is not required. To lose this body of expertise would be detrimental.</p> <p>On the other hand there is a body of opinion that believes that two of the assessors should be certified RPAs.</p>