

Guidance on Appointment of Radiation Protection Supervisors and 'Competent Persons'

1. Advice is given below regarding the arrangements for the appointment of RPSs. The relevant legislation requires that they are appointed by the employer (Regulation 17(4)) of the Ionising Radiation Regulations 2017 (IRR17), in order to help the employer secure compliance with the Regulations, in particular by supervising the arrangements set out in local rules.
Guidance to IRR17, published by the Health and Safety Executive, indicates that it is good practice to confirm the appointments in writing so that there is no confusion about the work expected of the RPS.

2. **Suitability for the appointment as an RPS**

The HSE Guidance referred to above, sets out a number of matters that should be considered when selecting a new RPS (Paragraphs 345-352, IRR17).

"A person's suitability for appointment as an RPS will depend both on a knowledge and understanding of the Regulations and local rules, and an ability to exercise a supervisory role. Employees who are appointed as RPSs are unlikely to fulfil the role envisaged by this regulation unless they:

- (a) *know and understand the requirements of the Regulations and local rules relevant to the work with ionising radiation;*
- (b) *command sufficient authority from the people doing the work to allow them to supervise the radiation protection aspects of that work;*
- (c) *understand the necessary precautions to be taken and the extent to which these precautions will restrict exposures; and*
- (d) *know what to do in an emergency.*

3. The University further requires that RPSs must be given the "knowledge, time, training and resources to enable them to fulfil their duties". (*Management at Work with Ionising Radiation, University Safety Office HSD007R*) Section 6 of the University of Cambridge Health & Safety Policy states that "Heads of Departments are responsible within their own domain for implementation of the Health & Safety University Safety Policy". The role of RPS is a "task" delegated by the Head of Department to an appropriate person or persons. Members of the department must be aware, however, that the RPS has been given the authority by the Head of Department to suspend work.
4. Although an RPS "need not be present all of the time", proper arrangements must be made to cover foreseeable absences by an RPS, for instance, periods of leave or attendance at conferences. Consideration should also be given as to how radiation protection supervision will be provided in the event of unforeseen absences, for example, during periods of illness. Sufficient RPSs must be appointed in line with the advice contained in Safety Office publication: HSD007R "*Management of Work with Ionising Radiations in the University of Cambridge*". Departments are reminded that an effective system of delegation of day-to-day radiation protection tasks within the various research groups should be established, and that this system must be audited, on a regular basis, by the appointed RPS.

In addition to the role under the Ionising Radiations Regulations, supervision of purchase and disposal of any radioactive source, and accumulation and disposal of radioactive waste must be ensured by 'competent persons'. This requirement is set out in the conditions included in the Permits issued to the University under the Environmental Permitting Regulations 2016 (EPR16), and also relates to Exemption Provisions in these Regulations - these items are enforced by the Environment Agency.

The names of the **competent persons** must be displayed with the copies of the Permits that are displayed in your department. It is generally expected that one or more of the appointed RPSs in a department will also fulfil the 'competent persons' role required by the EPR. Therefore, the RPSs must be aware of the requirements of the Permits within their Department.

5. Before appointment, adequate training must be given to an RPS. This will normally be by attending an appropriate local course together with discussion between the new RPS and the University Radiation Protection Adviser/Radiation Protection Officer. This requirement for training before appointment will require departments to plan any change of RPS well in advance and to discuss forthcoming changes with the University Safety Office.
6. The recommended manner of appointment of an RPS (preferably a University Teaching Officer or equivalent) is by discussion between the Head of Department and the nominated person, following the process as set out:
<http://www.admin.cam.ac.uk/offices/hr/policy/safety/>
This includes forwarding a copy of the appointment letter sent to the RPS to the Safety Office also. The proposed appointment is then reported to the University Radiation Protection Advisers, and subject to their advice, noted to the Consultative Committee for Safety, Sub-committee for Ionising and Non-ionising Radiations. The RPAs/University Radiation Officer will visit the new RPS and discuss local arrangements and the relevant legislation. Annual reappointment of RPSs (in writing) is required for each academic year.

For appointments of RPSs, please see attached a suggested form of letter that can be used. It is most important that "authority and facilities" are available to the RPS and that all members of the department are aware that the RPS is carrying out a delegated task on behalf of the Head of Department and enjoys the support of the Head of Department.

We hope the above points are useful - please do not hesitate to contact this Office if further information is required.

Example of an Appointment Letter for new RPSs

Dear

Appointment of Radiation Protection Supervisor

Further to our discussions and agreement (re payment) from the HR Division, I confirm that you will, with effect from *(date)*, on my behalf, undertake the role of Radiation Protection Supervisor (RPS) within the Department of This appointment will be reported to the Consultative Committee for Safety, Sub-committee for Ionising and Non-ionising Radiations and is subject to the advice of the University Radiation Protection Advisers. I agree to provide you with such resources and facilities as you may need to carry out the role, and to ensure that all members of the Department are informed that you have my authority to control matters in accordance with the local rules, relating to the safe use of ionising radiations within the Department. You should report to me any difficulties that may arise involving individual members of staff whilst undertaking this role on my behalf.

You should provide me with regular reports, at least annually, on the radiation protection tasks I have asked you to undertake, and you should also provide regular reports to meetings of the Departmental Safety Committee.

You understand that the appointment is conditional on you attending, at an early opportunity an initial training course, and, from time to time, attending Update Meetings. These courses and meetings will be arranged by the University Safety Office. I understand that the University Radiation Protection Officer/Advisers (RPO/RPA) will be visiting you in the near future and discussing further with you, the arrangements for training of RPSs and the role of an RPS within the University.

The primary role of an RPS is to assist the employer in complying with the requirements of the Ionising Radiations Regulations, 2017. Although the employer retains general responsibility for compliance with the Regulations, the RPS is expected to secure such compliance by ensuring that the Department 'Local Rules' for the use of Ionising Radiations are observed. Your role (**will/may/also – HoD to amend this as appropriate**) include provision of adequate supervision of the purchase and disposal of radioactive sources (open or sealed), and the supervision of the accumulation and disposal of radioactive waste as required by the Permits or Exemption Provisions issued under the Environmental Permitting Regulations 2016 (EPR16) - these enforced by the Environment Agency. This role will include co-ordination within this Department of the required record keeping and reporting systems required by the Permits or Exemption Provisions. You must have read, and comply with, these documents, and ensure that all users of radioactive substances also read these documents and comply with the written conditions and limitations.

Where necessary, and with the assistance of the RPO/A, you will also assist the management of the Department with preparing and revising the Departmental Local Rules (Ionising Radiations) Documents and risk assessments.

Yours sincerely

Head of Department

Copy to: University Radiation Protection Officer/Adviser, Safety Office
(radiation-protection@admin.cam.ac.uk)