

Classification of Radiation Workers

University of Cambridge Policy and Guidance, with reference to the requirements of the Ionising Radiations Regulations 2017 and including duties of employees.

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Introduction

There are currently a small number of Classified Radiation Workers within the University. The following guidance is provided by the University Radiation Protection Adviser to Departments and to Classified Workers, the significant requirements of the Ionising Radiations Regulations 2017.

Regulation 21 of The Ionising Radiations Regulations 2017 requires:

Classification is required if it is likely that an employee could receive an effective ('whole body') dose of 6mSv per year, or an equivalent dose, (for instance to the hands), which exceeds three tenths of any relevant dose limit.

The ACOP section to Regulation 21 also indicates that an employer should designate employees as classified if they work with any source of ionising radiation capable of giving the employee a dose in excess of any relevant dose limit, within several minutes (accident/incident scenarios as well as routine situations should be considered in this process).

Procedure for Classification of Workers

1. The need for the employer (University of Cambridge) to classify a particular individual is dependant on the outcome of the prior risk assessment relating to the work, and the general or specific advice of a Radiation Protection Adviser on the need for classification. Classification is also dependent on the individual being certified fit for the intended type of work by an Appointed Doctor (a registered medical practitioner appointed in writing by the Health and Safety Executive for the purposes of the Ionising Radiations Regulations 2017).
2. For an **existing post**, (that is, a new post holder replacing an existing Classified Worker), the risk assessment should be reviewed and the RPA should be informed of the new appointment as soon as possible. The Job Hazard Evaluation Form (OHF29) should be completed by the department and sent to Occupational Health, indicating the need for Classification of the individual.
3. If **new** work is proposed which on the basis of risk assessment indicates that an employee is likely to receive, in the course of the work, an effective dose in excess of 6 millisievert/year, or an equivalent dose which exceeds three-tenths of any relevant dose limit, then the RPA at the University Safety Office must be consulted regarding the need for Classification.

4. If the need to classify is confirmed by the RPA, the individual(s) concerned must be referred (by the department) to the Occupational Health in order for the Appointed Doctor to see the individual and to certify or otherwise their suitability for classification. The required Health Record form (see *paragraph 7, below*) and a Confidential Medical Record will be established by the Doctor.
5. In order to establish an efficient system and continuity of review, after the initial assessment which may take place at any time of the year, the first review will take place again in the first quarter of the year and then at yearly intervals after that time.
6. When suitability (or otherwise) is confirmed by the Appointed Doctor, the Doctor will write to the individual and to the Safety Office (to the RPA marked 'staff in confidence') confirming the situation. The completed Health Record form will also be sent to the Safety Office. Classification will then be progressed by the Department by completing a form provided by CPRMS. Classification requires a valid NI number, and visiting workers from overseas will be required to provide a suitable 'temporary' number as allocated by the Inland Revenue Office.
7. Copies of the monthly dosimetry results for each department will be supplied by CPRMS to the Department and to the Safety Office. Copies of quarterly summaries of dose reports for each Classified Worker will also be sent by CPRMS to the Safety Office. A copy of the Annual Dose Report for each Classified Worker for the preceding year will be sent by CPRMS to the Safety Office at the beginning of February. A copy of this report, together with the original Health Record (if this has already been established) for the worker, will then be sent to Occupational Health for the attention of the Appointed Doctor. Sickness absence records will also need to be provided to the Appointed Doctor by the Departmental administrator.
8. An updated list of currently Classified Workers will also be sent annually by the Safety Office to Occupational Health.
9. Occupational Health will arrange an annual review of health of each Classified Worker, normally in the first quarter of each year. *Persons attending for review of health must take evidence of their sickness absences record for the past year and confirmation of their NI number and name of their current GP to their Occupational Health appointment.* At the review of health, the Health Record (established in a format meeting the criteria required by HSE) for each Classified Worker will be completed (the *existing* Health Record will normally be used and updated if the Classified Worker has been seen in the previous year). Following the review of health, the updated Health Record will be sent to back the Safety Office for secure storage. Occupational Health will also make and keep a confidential medical record for each classified worker in a format agreed with the Appointed Doctor. The Health Record must be kept by the University until the Classified (or formerly Classified) Worker has or would have, attained the age of 75, but in any event for at least 30 years after the last entry has been made.
10. When a Classified Worker leaves the employment of the University, the Department must notify the Safety Office in order that CPRMS can be advised accordingly, and a 'termination dose report' issued and sent to the Safety Office. The Safety Office will send a copy of the termination record to Occupational Health, keep a copy with the former Classified Worker's dose records. The Safety Office will also endeavour to send a copy of the report directly to the individual if a forwarding address is available.
11. CPRMS will send a summary of the dose reports for each Classified Worker, each year, to the Central Index of Dose Information (HSE). The details in the Termination Reports are also sent to CIDI. CPRMS retain a copy of the Termination reports in their own files.

Duties of Classified Radiation Workers

Regulation 35 of The Ionising Radiations Regulations 2017 requires:

This regulation imposes a number of legal duties on all employees engaged in work with Ionising Radiations, and specifically in respect of Classified workers, sections 3, 4, and 5 of the regulation must be observed:

35 (3) If a radiation passbook is issued to a Classified Worker, it is the duty of every classified outside worker not to misuse the radiation passbook issued to that worker or falsify or attempt to falsify any of the information contained in it.

35 (4) requires the Classified Worker to comply with any reasonable requirement made by the employer for dose measurement and assessments, for example, to use and look after film badges/TLDs.

35 (5) requires the Classified Worker to attend, during working hours, (the Occupational Health for such medical examination and tests as required (annual health review) AND to provide to the appointed doctor such information regarding his/her health as the doctor may reasonably require (including sickness absence details, GP details, NI number). *Thus, failure to attend an agreed appointment could be seen as a breach, by the worker, of this Regulation.*

All employees engaged in work with Ionising Radiation must exercise reasonable care and also not knowingly expose themselves or any other person to Ionising Radiation to a greater extent than is reasonably necessary for the purpose of the work.

If any employee has reasonable cause to suspect that there has been an overexposure to themselves or any other person, or that there has been an incident or an occurrence (release or spillage) as defined in the Regulations, they must report this to the employer at the earliest opportunity.

Passbooks

Passbooks are required for Classified Outside Workers (Classified workers entering and carrying out services in other employers' controlled areas). Within the University, any Classified Worker holding a passbook should take this to Occupational Health when attending for their annual medical review. The passbooks referred to in Regulation 35 (3) above, must be kept up to date by the employee but the Department must also check that these are being completed. As the regulations require that the University ensures the information in the passbook is kept up to date, the Department must ensure this is done, and the University **expects reasonable co-operation from its Classified Workers**, in keeping the books updated).

Ceasing radiation work

Classified Workers and their Departments MUST notify the Cambridge Personal Radiation Monitoring Service (CPRMS, Addenbrooke's Hospital) at the earliest opportunity of their date of departure or date of cessation of radiation work which required Classification and copy to the Radiation Protection Adviser at the University Safety Office. As noted, the Safety Office will also endeavour to send a copy of the report directly to the individual if a forwarding address is available.

Appendix: Flow chart for Classification of Radiation Workers

WORKER CLASSIFICATION FLOWCHART

Orange = Safety Office (SO) actions, blue = Department actions, red = Occupational Health (OH) actions

