

The UK's experience of setting up a recognition system for Qualified Experts

Laurence Evans
Health and Safety Executive
London

Recognition system pre-2000

- ◆ The Ionising Radiations Regulations 1985
- ◆ Notification to HSE, before appointing a radiation protection adviser (RPA)
 - Qualifications and experience, also scope of advice required
- ◆ Await acknowledgement from HSE before confirming appointment
- ◆ IRR85 therefore placed all the responsibility on the employer to secure the services of an RPA

Why did the UK change its recognition system?

- ◆ Implementation of the 1996 BSS Directive – opportunity to revise recognition system
- ◆ Reasons for change were twofold:
 - Expectations had changed about formal means to recognise competence
 - HSE wished to reduce burden on employers by requiring RPAs to demonstrate their competence

Revised system of recognition

- ◆ The Ionising Radiations Regulations 1999
- ◆ Separates core competence from suitability
- ◆ Definition of RPA covers competence:
 - ‘An individual who, or a body which, meets such criteria of competence as may from time to time be specified in writing by the Executive’
- ◆ Employer duty to consult *suitable* RPA
- ◆ HSE Statement on RPAs contains criteria for demonstration of core competence
- ◆ Recognition structure – role of Assessing Bodies

HSE Statement on Radiation Protection Advisers (RPAs)

- ◆ HSE Statement is core document outlining RPA recognition system in the UK. Has 3 annexes:
- ◆ Annex 1, criteria of (core) competence
 - Part I: criteria of competence for individuals wishing to be recognised as RPAs
 - Part II: criteria of competence for organisations seeking recognition as RPA Bodies
- ◆ Annex 2, requirements for RPA Assessing Bodies
- ◆ Annex 3, basic underpinning knowledge

Criteria of Core Competence for individual RPAs

- ◆ Based on the basic syllabus for qualified experts in Annex 1 of C133
- ◆ Demonstrated by either:
 - Certification by a body recognised by HSE for this purpose (an 'Assessing Body'), or
 - Holding a relevant National/Scottish Vocational Qualification at Level 4 issued in last 5 years

Criteria of Core Competence for individual RPAs – cont.

First time recognition

- ◆ (a) sufficient evidence, from education, training and/or experience, to demonstrate:
 - Knowledge and understanding of the basic syllabus in Annex 3, to the required level
 - Detailed understanding of IRR99 and related Approved Code of Practice and guidance
 - Practical radiation protection experience

Criteria of Core Competence for individual RPAs – cont.

- ◆ (b) sound knowledge of general methods which might typically be used to deal with operational problems, including:
 - Interpreting and applying radiation protection data
 - Supervising or carrying out practical measurements and control procedures for work involving potential for significant exposure

Criteria of Core Competence for individual RPAs – cont.

- ◆ (c) ability to advise management effectively on implementation of relevant regulatory requirements and radiation protection practices for work involving potential for significant exposure to ionising radiation

Criteria of Core Competence for individual RPAs – cont.

Renewal of recognition (certification valid for maximum of 5 years)

- ◆ Suitable evidence that have kept up to date
 - Knowledge and experience of radiation protection legislation
 - Awareness of relevant technological advances
- ◆ Individuals holding a Level 4 N/SVQ issued 5 years previously need also to apply to an Assessing Body for certification and demonstrate the above

Criteria of Core Competence for RPA Bodies

For a body to meet the definition of a RPA in IRR99, it must demonstrate to HSE that it:

- ◆ (a) Is constituted as, or comprises an identifiable part of, a legal entity or partnership or other grouping that is capable of being recognised

Criteria of Core Competence for RPA Bodies – cont.

- ◆ (b) has personnel who include a sufficient number of persons who satisfy the criteria of competence for individual RPAs
- ◆ (c) has management systems and written quality assurance procedures so that any advice is traceable to one or more individual RPAs certificated as core competent

Criteria of Core Competence for RPA Bodies – cont.

- ◆ HSE processes:
 - Recognition valid for maximum of 5 years
 - Investigation and, if appropriate, withdrawal of recognition
 - Reasons in writing and opportunity to make representations
 - Appeal procedure

Requirements for Assessing Bodies

To be recognised as an Assessing Body for the purpose of assessing individuals against the HSE criteria of competence for RPAs, an organisation must demonstrate to HSE that it

- ◆ (a) Is constituted as, or comprises an identifiable part of, a legal entity or partnership or other grouping that is capable of being recognised

Requirements for Assessing Bodies – cont.

- ◆ (b) has in place formal schemes which meet the requirements for
 - Coverage of certificates (sufficient expertise)
 - Application process (infn from applicants)
 - Assessment procedures
 - Proof of assessed competence (certification)
 - Appeal and complaint procedures
 - Reporting to HSE annually

Requirements for Assessing Bodies – cont.

- ◆ (c) has an organisational structure and arrangements capable of ensuring that these formal schemes are not open to arbitrary change and will continue to meet those requirements, eg changes to the formal schemes have to be agreed by a Board, Governing Body, or equivalent.

Requirements for Assessing Bodies – cont.

- ◆ HSE processes:
 - Recognition subject to conditions and reviewed after 3-4 years
 - Investigation and, if appropriate, withdrawal of recognition of an Assessing Body
 - Reasons in writing and opportunity to make representations
 - Appeal procedure
 - Certificates issued prior to withdrawal to remain valid

How has the HSE Statement worked in practice?

- ◆ New recognition system operating for 5 years
- ◆ Over 400 individuals recognised as RPAs
- ◆ 10 organisations recognised as RPA Bodies
- ◆ 3 Assessing bodies recognised by HSE
- ◆ Employers satisfied with new system
- ◆ Sufficient number of RPAs across the UK
- ◆ Overall, recognition system is working well

Difficulties encountered

- ◆ Take up of Level 4 N/SVQ very poor
- ◆ Only 2 Assessing Bodies operating and only one of these (RPA2000) assesses applications from external applicants

Issues encountered

- ◆ No precise definition of the term 'practical radiation protection experience' – this led to difficulties for Assessing Bodies
- ◆ Criteria of Core Competence for renewal of individual RPA certification unclear – HSE adopted a 'light touch' approach and additional guidance produced in 2003

Current and future developments

- ◆ HSE decided in 2005 that it was time for a review of the Statement, to address the following:
 - Clarify wording in the Statement where it is currently ambiguous
 - Correct administrative details that have changed since the Statement was issued in December 2001
 - Remove unnecessary barriers to the smooth operation of procedures using the experience gained since 2001; and
 - Address the potential to remove unnecessary requirements placed on RPAs.

Current and future developments – cont.

- ◆ The aim of this review is to have a new Statement that will be:
 - Clearer and meet the future requirements of IRR99 and industry
 - Consistent with the current requirements in the 1996 BSS Directive, and
 - Providing revised guidance on some of the areas where there is currently uncertainty

Current and future developments – cont.

- ◆ In June 2005, HSE launched a formal consultation with its external stakeholders
- ◆ Consultation now closed, HSE currently analysing responses
- ◆ HSE will make final decisions on all the issues arising from the consultation and produce a revised Statement

Conclusion

- ◆ The UK's recognition system is working well
- ◆ Partnership with Assessing Bodies invaluable
- ◆ Over 400 applications for individual RPA recognition processed and employers satisfied.
- ◆ However...

Conclusion – cont.

- ◆ Important to precisely define terms when laying down criteria of core competence
- ◆ Difficulties with ‘practical radiation protection experience’ – way forward may be to indicate which topics in basic syllabus require practical experience

Conclusion – cont.

- ◆ Need to develop robust standards and criteria for assessment of individuals – Assessing Bodies have helped HSE in this area
- ◆ System based on a partnership approach with Assessing Bodies: no point setting up a recognition route if no partners can be found

References

- ◆ 1) Council Directive 96/29/Euratom
- ◆ 2) Work with ionising radiation: Ionising Radiations Regulations 1999: Approved Code of Practice and Guidance, L121
- ◆ 3) The Ionising Radiations Regulations 1985 (now superseded by IRR99)
- ◆ 4) Council Directive 80/836/Euratom
- ◆ 5) HSE Statement on Radiation Protection Advisers
- ◆ 6) Communication from the Commission concerning the implementation of Council Directive 96/29/Euratom laying down the basic safety standards for the protection of the health of the workers and the general public against the dangers arising from ionising radiation. OJ 98/C133/03