EFRS recommendations for the national implementation of the Radiation Protection Officer (RPO) role as defined under Basic Safety Standards Directive (2013/59 EURATOM)

Background

In March 2016, the EFRS outlined its recommendations regarding the national implementation of the Basic Safety Standards Directive, which emphasised the need for national radiography societies to define detailed roles and responsibilities of the Radiation Protection Officer (RPO) (as per Article 84 of BSS 2013/59) and to establish, education, training and retraining options, to ensure the RPO role can be recognised (Article 14:3) as a radiographers’ role.

The EFRS feel strongly that the RPO role for radiographers is essential to the medical exposure setting – although not specified within the BSS Directive – as a means to further encourage a culture of patient safety within radiography and also to promote best practice in radiation protection. This document aims to elaborate on the above recommendation.

Recommendations

While the Directive requires the recognition of medical physics experts and radiation protection experts, it does allow Member States flexibility in whether to recognise the RPO role; ‘If appropriate, Member States may establish the arrangements for the recognition of radiation protection officers’ (Article 79.1), or else to ‘assign the tasks of the RPO role to a radiation protection unit or by a radiation protection expert’ (Article 84.3). Therefore the involvement of radiographers in this important role should be introduced in national legislation. As Article 84.1 stipulates that ‘Member States shall decide in which practices the designation of a radiation protection officer is necessary to supervise or to perform radiation protection tasks within an undertaking’, it is important to impress on the national competent authority, the relevance of and the application of the RPO role for radiographers in medical exposures.

Therefore member organisations are asked to urgently:

- Agree and detail specific roles and responsibilities of the RPO within the medical exposure setting (see appendix for sample list) and communicate these to the national competent authority. Currently Article 84.2 lists generic sample tasks that are not specific to the medical use of radiation, so it is essential to provide the competent authority with details of the importance of the RPO role for
radiographers and its relevance nationally to ensure it is recognised, but also that the tasks are relevant to radiography (medical imaging, nuclear medicine and radiotherapy) departments.

- Agree and define education, training and retraining requirements for the RPO role for radiographers and again communicate these with the competent authority. Article 14.3 requires ‘Member States may make arrangements for the establishment of education, training and retraining to allow the recognition of radiation protection officers, if such recognition is provided for in national legislation’ so provision of such information will again further facilitate the introduction of this role.

Ensuring the RPO role for radiographers is recognised and implemented nationally within medical exposure settings can only improve the radiation protection culture and maximise the benefit to patients from same.

APPENDIX:

Specific tasks of the Radiation Protection Officer in the Medical setting (adapted from the Irish Institute of Radiography and Radiation Therapy (2014). Role of the Radiation Protection Officer. IIRRT: Dublin).

Technical

- Develop, implement, maintain and monitor a radiographer-led quality assurance (QA) programme for the imaging department in conjunction with medical physics expert (MPE) and the Radiation Protection Expert (RPE).
- Establish, co-ordinate and lead a QA team (where applicable).
- Organise the routine personnel radiation monitoring of staff. Maintaining individual radiation dose records for all monitored staff and submitting reports as appropriate.
- Organise, in conjunction with the RPE, routine risk assessment in relation to the working environment, staff doses, potential doses to members of the public and non-monitored staff.
- Develop and implement a system to establish and systematically review Diagnostic Reference Levels (DRLs).
- Develop and implement a system to ensure all personal radiation safety devices are checked annually for faults/deficiencies.
- Liaise with service providers / manufacturers / service managers regarding the routine service and maintenance of radiographic equipment.
• Develop and implement a record keeping system whereby all technical duties are recorded and appropriately addressed.

• Advise on the selection, purchase, replacement or upgrading of appropriate QA equipment in conjunction with the RPE / Radiography Services Manager (RSM).

**Implementation of Legislative Requirements (Policy and Procedure)**

• In conjunction with the RPE, create, maintain and update a departmental radiation safety manual.

• Ensure all legislative requirements, regulatory body guidelines, licensing requirements and accepted best practice guidelines are fulfilled and represented by the policies and procedures of the facility.

• Ensure structures are in place to record all relevant information relating to all radiation policy for the purposes of inspection, investigation, external report and audit.

• Ensure a radiation safety manual, and all radiation policy, is easily accessible for those wishing to do so.

• Liaise with radiation safety committee members responsible for radiation safety in other areas of the hospital.

• Assist in the development of risk management and health and safety strategies in association with appropriate personnel within the hospital.

**Education and Research**

• Participate in research activities consistent with the position. This should include the promotion and participation in research projects involving radiation safety. It should also include participation in clinical audits as relevant to the post.

• Maintain up to date knowledge of recommendations, legislation, relevant guidelines and standards pertaining to ionising radiation.

• Attend approved courses to improve the knowledge base and to keep up to date with current advances in the field and with changes to the legislative requirements as part of their own continuous professional development (CPD).

• Ensure, in collaboration with the RSM and the RPE, that each monitored member of staff receives appropriate radiation safety induction and updates where necessary.

• Ensure, in collaboration with the RSM and the RPE, all un-monitored staff are adequately informed about the hazards of radiation, potential occupational exposures and associated risks.

• Be involved in the education of authorised referrers of ionising radiation.

• Be involved in the education of designated medical specialists and the delivery of radiation safety courses.

• Ensure all radiation protection training/education and updates are appropriately recorded for audit / review purposes
• Provide advice on the selection, purchase, or replacement of protective shielding devices both in the main department and in satellite areas.