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Guidance on Escalation Procedures for Resolving Radiation Safety Disputes: Establishing Clear Resolution Paths

Background

Under the Ionising Radiations Regulations 2017 (IRR17)¹, organisations that use ionising radiation and have permanent or temporary controlled or supervised areas on their premises must appoint one or more Radiation Protection Supervisors (RPS) to oversee safe practice in those areas. The basic role of the RPS is to ensure that any work with ionising radiation is performed in compliance with the IRR17 and the local rules required by those regulations. The IRR17 fall under the general legislative area of Health and Safety at Work, and the RPS role in industry tends to reflect this, with RPS's commonly being specifically employed in the role and having sufficient authority within the management structure of the organisation to ensure compliance with local rules. The situation within healthcare is usually different, however, with RPS's typically being senior radiographers or medical physics technologists supervising practice within areas of radiology, nuclear medicine and other departments where ionising radiation is used. This brings the RPS into daily contact with users of ionising radiation, e.g. medical and nursing staff, who are not part of their own management structure. On occasion, this can bring the RPS into conflict over radiation protection matters with staff over whom they have no authority. This can be stressful for the RPS and unproductive for the organisation.

The view of the Health and Safety Executive (HSE)

This problem has recently been raised in meetings of the BIR Radiation Safety Special Interest Group, and the HSE expressed the view that their inspectors would expect organisations to have escalation procedures in place so that potential conflicts over radiation protection matters are efficiently passed up the management structure to the appropriate level for resolution. The purpose of this advice note is to ensure healthcare organisations are aware of this expectation.

Suggested Outline Procedure

To counter the kind of problem described above, all organisations should have in place a procedure to clarify the route through the management structure that conflicts over radiation safety matters should take. This will vary depending on the size of the organisation, but will typically involve escalation through department and directorate management to the level at which authority over both sides of the dispute lies. The organisation's health and safety committee or equivalent might well sit at this level. It is probably not appropriate for responsibility for the resolution of such problems to sit with the organisation's Radiation Protection Adviser, but in their role to advise the organisation on the requirements of IRR17 they may well contribute to the solution.

[1] Gov.uk, 'The Ionising Radiations Regulations 2017' (www.legislation.gov.uk/2017)
<https://www.legislation.gov.uk/ukSI/2017/1075/contents>