

February 2025

Ionising Radiations Regulations 2017 Notification, Registration and Consent

Information in relation to the requirements for notification, registration and consent for compliance with Ionising Radiations Regulations 2017 (IRR17)¹ can be found on the Health and Safety Executive (HSE) website: <https://www.hse.gov.uk/radiation/ionising>.

For first time users involved with work with ionising radiation, if your practice is deemed:

- low risk – you must notify
- medium risk – you must apply for a registration
- high risk – you must apply for consent

In a hospital environment, consents relate to aspects such as: radiopharmaceutical administrations to persons for diagnosis, therapy or research; addition of radioactive substances in the production or manufacture of consumer products e.g. in a radiopharmacy; using an accelerator (in which particles are accelerated to emit ionising radiation with energy higher than 1 MeV) e.g. to perform radiotherapy; working with a high activity sealed source (HASS) e.g. for brachytherapy/ radiotherapy and discharging of significant amounts of radioactive material with airborne or liquid effluent into the environment (see HSE website for further details). For work with radiation generators (such as X-ray devices), registration typically applies, unless it is deemed a high-risk work practice requiring consent (see HSE website for further details).

When applying for consent a safety assessment must be submitted to the HSE. It may be a requirement to notify or hold registrations and consents at the same time. The link to the RADAN online portal for submission of information can be found on the HSE website.

Reconsenting

Existing consent holders (for consents granted before 1 October 2023) will be contacted in due course by the HSE to submit a safety assessment. The process for requesting and submission of safety assessment reports for consenting / re-consenting duly began in October 2023 and is steadily progressing. This process is likely to complete in the coming years.

Fees

A specialist radiation inspector will review the safety assessment and inspect the work practice before initial consent or re-consent is granted. Current information on the HSE website (February 2025) indicates that a fresh consent application normally takes up to 3 months and a fee will be charged to cover HSE's costs. From 1 April 2024 to 31 March 2025 the hourly rate charged is £216 (as stated on the HSE website in February 2025, subject to change).

The HSE website indicates that the total average charge is 'expected to be up to £6,000 per consent but this will vary depending on the suitability and complexity of the application' (February 2025). As such, organisations must ensure that senior finance managers are informed of the potential costs for consenting and reconsenting processes (taking into account the range and number of consents in place/required) to ensure adequate funds are available.

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