

RPA001: A guide to the CLEAPSS RPA service for local authorities, multi academy trusts (MAT) and other brokering organisations

This guide is for organisations already offering the CLEAPSS Radiation Protection Advice (RPA) service to schools and colleges where they are not the employer. The service is limited to radioactive materials included within the scope of CLEAPSS guide L093. These include all those commonly used in the teaching of science in schools and colleges. It does not cover other sources of ionising radiation, for example environmental radon.

This guide focuses on processes needed when a school or small group of schools joins the CLEAPSS RPA service through an existing service provider for the first time, or where they transfer from one provider to another. Employers wishing to organise RPA advice for their own schools and organisations wishing to set themselves up as brokers should contact CLEAPSS directly.

Introduction

Small radioactive sources are commonly used in secondary-school science to teach about radioactivity. The sources, if used and managed correctly, pose little risk. However, the sources needed for effective science demonstrations are mostly above the Ionising Radiations Regulations regulatory exemption. This means school employers have to conform to the regulations on using radioactivity¹, one of which is to consult and if necessary, appoint a suitable radiation protection adviser (RPA).

To help school employers meet these regulations without excessive cost, CLEAPSS provides an RPA service through the CLEAPSS RPA Body. This service is not available directly from CLEAPSS, schools and colleges wishing to make use of it must join via a service provider such as a local authority, a multi-academy trust or other brokering organisation. The CLEAPSS RPA service is only available if an organisation holds CLEAPSS membership, and is subject to a small supplementary charge per school. The current rate for this service is in CLEAPSS guide G001. This charge does not include any school visits by a Radiation Protection Adviser. If a visit is necessary, there will be an additional charge.

The service is available on the following conditions;

1. The local authority/MAT or brokering organisation has CLEAPSS membership.
2. The schools included are themselves CLEAPSS members, either through the local authority/MAT/brokering organisation, or in another way.
3. The local authority/MAT/brokering organisation appoints a Radiation Protection Officer (RPO) (see below)

The CLEAPSS RPA Service – how it works

Radiation protection officer (RPO)

Any organisation offering the CLEAPSS RPA service must designate a person or persons to act as a Radiation Protection Officer (RPO). This person is usually a health and safety adviser, or sometimes an education adviser. The RPO role is not a technical one. CLEAPSS expects RPOs to make monitoring visits to

¹ The Ionising Radiations Regulations 2017 & Ionising Radiation Regulations (Northern Ireland) 2017

each school included in the service. More details on the role of the RPO can be found in guide RPA002 which is available on our website. CLEAPSS also provides occasional training courses and update meetings for RPOs, attendance at which is compulsory.

The Caseworker RPA

When an organisation joins the CLEAPSS RPA service the employer is appointing the CLEAPSS RPA Body as its source of radiation advice. This is reflected in the letter of appointment (e-mail). Within the service CLEAPSS has a number of accredited RPAs who support the work of the service. One of these RPAs will be identified as a caseworker for each employer covered by the service. The caseworker RPA has an important role in monitoring the interaction between the RPOs and the schools they cover, however they are not intended to be the source of routine advice. In the first instance RPOs should contact CLEAPSS and should advise schools to do the same. **Other than in exceptional circumstances, the RPO should not give the caseworker RPA's contact details to the schools or Radiation Protection Supervisor (RPS)(schools).**

Adding a new school or group of schools through an existing broker

We advise that individual schools and employers with a group of schools have an informal conversation with CLEAPSS first to check that they need to appoint an RPA, and that service we offer is appropriate for them. This is not, however, essential and schools may contact a brokering organisation directly.

When considering adding a large number of schools, a broker must contact CLEAPSS in advance so we can check that the caseworker RPA has the capacity to take on the additional work and make alternative arrangements if not. RPOs should not contact their Caseworker RPA directly about this.

When a brokering organisation receives an enquiry:

- The RPO sends a Form 1 to every school that has expressed interest joining the CLEAPSS service through them.
- Each school must complete and return a **new Form 1** irrespective of whether the school has been included in the CLEAPSS service before or not. (Form 1 is available from our website). Be aware that the information on existing copies of this form may be out of date and may no longer accurately reflect the materials held by the school.
- As part of this process all schools need to complete the inventory (included in Form 1) that lists all their radioactive materials used for science teaching, no matter how trivial they may seem.
- The RPO e-mails the completed Form 1 (including the inventory) to the caseworker RPA. The Form 1 can be a Word document, or scanned and sent as a pdf.
- The caseworker RPA will review the Form 1, and in particular the inventory, and determine if the employer needs to appoint an RPA. and if so, whether the CLEAPSS service is suitable.
- If an RPA is needed and the CLEAPSS service is appropriate the caseworker RPA will use advice letter RPA030 to advise:
 - What each school needs to do to comply with the requirements of the Ionising Radiations Regulations.
 - What each school needs to do to fall within the scope of the guidance in L093.
- The RPOs sends the advice from the caseworker RPA to the employer in the school*
- The RPO must also contact the CLEAPSS membership team to discuss adding the school(s) to their service offer on the CLEAPSS membership database. The CLEAPSS team will check that the school is a member of CLEAPSS (remember the CLEAPSS RPA service is only available to schools that hold current CLEAPSS membership) and that it is not already a member of the CLEAPSS RPA service via another provider.

- If the school already has access to the CLEAPSS RPA service via another route then a new broker will not be able to add the school to its membership list until the existing membership has expired.
- If the employer decides to join the CLEAPSS RPA service via the broker, they need to formally appoint CLEAPSS RPA Body as their source of RPA advice.
- The broker manages this process using the e-mail template included in CLEAPSS guide RPA021. The broker should keep a copy of this e-mail on file. Brokers do not need to send a copy to CLEAPSS.
- Once the employer has returned the letter of appointment, the initial advice has been sent **and** the RPO has worked with the CLEAPSS membership team to ensure the school(s) can be added to their offer, the RPO should arrange with the school(s) to make an initial visit. This must be an in-person visit whose purpose is to verify the information submitted by the school(s) on Form 1 and the accuracy of the inventory.
- CLEAPSS will invoice the broker for the cost of including the additional school(s).

*Note. Schools must act on the advice from the caseworker RPA (plus any further advice from CLEAPSS arising from the initial visit by the RPO) in a timely manner. This is a condition of CLEAPSS RPA Body agreeing to become the school(s) legally appointed source of radiation protection advice. In the event that a school does not do this the RPO should contact CLEAPSS who will then follow this up with the school.

The CLEAPSS RPA Service – removing schools

If a school(s) decides to move to another broker within the CLEAPSS service, or appoints an RPA directly, or to discontinue its membership (for example because it no longer holds any radioactive materials) it should notify the existing broker as soon as possible. Changes between brokers within the service are best made at the end of the 12-month membership period as no refunds on fees paid to CLEAPSS are possible. New brokers can only take over schools when the previous period of cover has expired (unless the previous broker has withdrawn from the service).

If a brokering organisation is unable to continue to offer access to the CLEAPSS RPA service, for example because it is unable to identify a suitable person to carry out the role of RPO, it must inform the schools covered through it, and let CLEAPSS know in good time.

Notes:-

- Form 1 is intended to inform the initial decision as to whether an employer/school needs to appoint an RPA and whether the CLEAPSS service is appropriate. It is not intended for use in subsequent monitoring by RPOs. This should instead be structured around the check list in appendix 1 of the RPO handbook RPA002 and should include an up-to-date inventory of sources held
- CLEAPSS cannot invoice the school(s) directly, the CLEAPSS RPA service is only available to schools through LAs/MATs/brokers acting as brokering organisations.
- CLEAPSS RPA charge to LAs, MATs or brokers cannot be adjusted for part years
- The LA/MAT or other organisation wishing to join the service on behalf of schools where it is the employer should contact CLEAPSS. If appropriate, they can apply to join the service using application form RPA010.
- If the application is successful the employer, then formally appoints the CLEAPSS RPA Body as its source of radiation safety advice using the e-mail template included in CLEAPSS guide RPA020. CLEAPSS will then identify a caseworker RPA.

Various forms and letters used in the service are explained in this table

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| Form 1 | One to be completed by each school when joining the service. Gives details of the sources held, etc. Brokers use Form 1 to collect this information. It is not reliable to use old records because schools may have acquired or disposed of sources since completing them. |
| RPA001 | This guide - which explains the CLEAPSS RPA service |
| RPA002 | CLEAPSS Radiation Protection Officer (RPO) handbook |
| RPA003 | Advice for Caseworker RPAs working in the CLEAPSS service |
| RPA010, RPA011 | RPA010 is the application form for a local authority or MAT to join the CLEAPSS RPA service. RPA011 is the application form for a brokering organisation (for example a Health & Safety company) to broker membership of the CLEAPSS RPA service. |
| RPA020, RPA021 | Letter from caseworker RPA following consultation, confirming the employer in the school(s) needs to appoint an RPA, including a template e-mail for the employer to formally appoint CLEAPSS RPA Body as their source of radiation advice. RPA021 is a modified version of RPA020, designed for use where the employer/school is obtaining the service through a third party, eg a broker or local authority traded service which is not the employer in the school. |
| RPA030 | Initial letter of advice from the caseworker RPA allocated by CLEAPSS, sent to the schools joining the service via the RPO. Schools must act on the advice from the caseworker RPA (plus any further advice from CLEAPSS arising from the initial visit by the RPO) in a timely manner. This is a condition of CLEAPSS RPA Body agreeing to be the school(s) legally appointed source of radiation protection advice. |

The CLEAPSS RPA Service flowchart on the next page shows how the RPA service works **for existing service providers/brokers adding schools**.

(Note: Employers wishing to organise RPA advice for their own schools and organisations wishing to set themselves up as brokers should contact CLEAPSS directly)

School/employer approaches a CLEAPSS RPA service provider/broker wishing to join the service

The service provider's RPO collects information from the school(s) using Form 1 and ensures that they have an up-to-date inventory of sources held for each school.

RPO copies of the Form 1s (including an inventory of sources) and sends it to their caseworker RPA by e-mail

The caseworker RPA, acting on behalf of CLEAPSS RPA Body, advises, on the basis of the information provided, whether an RPA needs to be appointed and whether the CLEAPSS RPA service is appropriate.

**RPA not
required**

The employer keeps a record of the consultation process and the outcome.

**RPA
required.**

The employer/school decides to apply join the service via the service provider

The caseworker RPA sends the RPO a completed RPA030 advising on what needs to be done in each school.

The RPO forwards this advice to **each** school.

Note: If the school is unable or unwilling to meet these requirements, CLEAPSS cannot provide the RPA service.

The RPO contacts the CLEAPSS membership team to discuss adding the school(s) to their service offer on the CLEAPSS membership database.

Having reviewed the initial advice, the school/employer decides it wishes to go ahead with membership
and
CLEAPSS membership team has confirmed that this is possible

The employer in the school formally appoints CLEAPSS RPA Body as their source of radiation advice using the e-mail template included in CLEAPSS guide RPA021.

The RPO keeps a copy of this e-mail - They do not need to send a copy to the caseworker RPA or CLEAPSS.

CLEAPSS invoices the broker (not the school)

RPO arranges initial face to face monitoring visit to school to verify the information provided on Form 1 and the accuracy of the inventory

A report on the monitoring visit reports need to be completed and sent to the RPS(schools), the Headteacher and the caseworker RPA (See RPA002).

Queries or problems

The RPO advises school(s) to contact the CLEAPSS *Helpline* for advice.
CLEAPSS will refer these to the caseworker RPA if the guidance required is not routine.

In addition to the above the caseworker RPA raises issues with RPO and CLEAPSS as appropriate. CLEAPSS contacts school(s) directly as necessary (for example if a school does not implement the advice from CLEAPSS in a timely manner.