

Education and training legal requirements: can they be met in COVID-19-times?

Barbara Godthelp HERCA WG E&T in RP

HERCA

- HERCA is a voluntary association in which the **Heads of Radiation Protection Authorities** work together in order to identify common issues and propose practical solutions for these issues.
- HERCA is working on topics generally covered by provisions of the EURATOM Treaty.
- The program of work of HERCA is based on common interest in significant regulatory issues.

Participation

32 countries

(the 28 EU MS + Iceland, Norway, Switzerland and Serbia)

56 organisations

(RPA + TSO), + 330 nominations

Observers

EC, IAEA, WHO, US FDA,
OECD/NEA



HERCA Structure & Functioning



Terms of Reference
& HERCA Policies

Chairmanship

Mrs Karla PETROVA, SUJB, CZ,
2018-2020

Working Groups (WG)

Emergencies
Medical Applications
Veterinary Applications
Research & Industrial Sources & Practices
Education & Training
Natural Radiation Sources - NEW

Networks (NT)

Dose Passbook/Outside workers
Collective medical doses

Task Forces (TF)

Workshops (WS)

RPE and RPO implementation: legal requirements

17.1.2014

EN

Official Journal of the European Union

L 13/1

II

(Non-legislative acts)

DIRECTIVES

COUNCIL DIRECTIVE 2013/59/EURATOM

of 5 December 2013

laying down basic safety standards for protection against the dangers arising from exposure to ionising radiation, and repealing Directives 89/618/Euratom, 90/641/Euratom, 96/29/Euratom, 97/43/Euratom and 2003/122/Euratom

RPE and RPO implementation: legal requirements

[73] "radiation protection expert" means an individual or, if provided for in the national legislation, a group of individuals having the knowledge, training and experience needed to give radiation protection advice in order to ensure the effective protection of individuals, and whose competence in this respect is recognised by the competent authority;

[74] "radiation protection officer" means an individual who is technically competent in radiation protection matters relevant for a given type of practice to supervise or perform the implementation of the radiation protection arrangements

RPE and RPO implementation: legal requirements

Article 14 General responsibilities for the **education, training** and provision of information

Article 34 Consultations with a radiation protection expert

Article 68 Tasks for the undertaking

Article 79 Recognition of services and experts

Article 82 Radiation protection expert

Article 84 Radiation protection officer

HERCA WG E&T in RP

- Workshop 2015
- Guidance
- Country fact sheets
- Questionnaire
- Workshop 2021



HERCA Guidance
Implementation of Radiation Protection
Expert (RPE) and Radiation Protection
Officer (RPO) Requirements
of Council Directive 2013/59/Euratom

November 2017

This document was approved by the Board of HERCA on 3 November 2017

July 2015, Paris



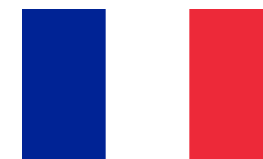
Mandate WG on E&T in RP

With regard to Education and Training the WG shall:

1. Enable MS to have a **common understanding** of the EU BSS Directive
2. **Identify useful reports** that might be considered as helpful reference for HERCA MS in the implementation of the EU BSS Directive: **guidance document** of WG E&T in RP to assist HERCA MS in the use of these documents
3. **Set up a framework** for following up transposition
 - a **new survey**, updated general picture of the situation on education, training and information in RP in the HERCA MS
 - Make use of **country fact sheets**
4. **Maintain oversight** of any developing guidance on education and training
5. Recommend **further work**, as needed, to address any pending issues not solved: assess the potential of mutual recognition and further work on E&T in RP

Country Factsheets and Questionnaires

- National approaches to the implementation of the RPE and RPO
 - **country factsheets and Questionnaire's** on RPE and RPO to gather information from the MS on the implementation of RPE/RPO
- Enabling a quick comparison and to enable a common understanding between MS
- So far contributions of **25 HERCA MS**



Country Factsheet analysis

- National approaches to the implementation of the RPE and RPO
 - Most MS contributed (25/32)
 - Information that can be subtracted:
- Basic questions:
 - Are RPE and RPO both implemented
 - National terminology
 - Translation
 - Role

Country Factsheet analysis

- Basic questions: continued
 - Categories
 - Recognition
 - Educational level (basic training)
 - Prescribed training (RPE-specific)
 - Requirement of experience
 - Training and retraining
 - Recognition for X-years, or for life
 - Recognition entity
 - Combination of function RPE/MPE (other combinations)
 - (Bilateral) agreements on recognition

The Netherlands

RPE & RPO Fact Sheet

The RPE. Definition, role and function in national legislation

The RPE is implemented in national legislation as 'Stralingsbeschermingsdeskundige' (SBD), which is a literal translation of 'Radiation Protection Expert'. The role and function of the RPE in national legislation is to provide competent advice, or to supervise, the compliance with legal requirements on behalf of the undertaking, in respect of occupational and public exposure.

The RPE is an individual and cannot be a group of individuals. However, the RPE may be a member of a Radiation Protection Unit (RPU). The presence of an RPU in an undertaking can be mandatory depending on the types of practices.

The advice of an RPE is mandatory for all type of practices. The RPE can be an employee of the undertaking, but may also be an external consultant.

RPE's are allowed to advise or supervise all types of exposures and all fields of practices (comprehensive expert), but in reality the RPE will be a specialized expert for some practices. The level of the required expertise should be commensurate to the associated risk of the practice. At this moment two RPE-levels are implemented. The higher RPE-level is in general required for undertakings that have a more complex licence and/or require a higher level of radiation protection.

The RPO. Definition, role and function in national legislation

The RPO is implemented in national legislation as 'Toezichhoudend Medewerker Stralingsbescherming' (TSB), which can be translated as 'Supervisory Officer Radiation Protection'. The role and function of the RPO is both to supervise and/or to perform the implementation of the radiation protection arrangements for a given type of practice in the undertaking. The RPO is an employee of the undertaking. The undertaking is required to provide adequate education, training and retraining in the field of radiation protection, specific for the type of practice. The employer of outside workers is also required to designate an RPO as necessary to supervise or perform relevant radiation protection tasks as they relate to the protection of their workers. The RPO is mandatory for all types of practices. There are nine types of RPO, who are specialized in a specific type of practice.



Country info

Capital	Amsterdam
Official language	Dutch
Population	17 M
Area	41 500 km ²
Currency	Euro (€)
Time zone	UTC + 1
Calling code	31
Internet TLD	.nl

Competent Authority

ANVS (Authority for Nuclear Safety and Radiation Protection), resorting under the Ministry of Infrastructure and Environment (Min IenM)

Other authorities involved

- Ministry of Health, Welfare and Sport (Min VWS) for medical exposures and Medical Physics Experts
- Ministry of Social Affairs and Employment (Min SZW) for exposure of workers.

Implementation of E&T requirements in

- Besluit basisveiligheidsnormen stralingsbescherming ('Basic safety standards radiation protection)



RPE tasks

Possible tasks and topics of advice of the RPE may include the topics mentioned in the BSS (articles 82.2, 34, 37, 38, 68), such as categorisation of controlled and supervised areas, quality assurance, licensing, dose monitoring, setting up ALARA, prevention, training etc. When necessary, the RPE cooperates with and liaises with the RPO and the Medical Physics Expert in a medical centre. The RPE may be assigned the tasks of radiation protection of workers or members of the public. The RPE may also perform the tasks of an RPO.

RPE education, training & retraining

A specific RPE-basic training course with specified learning outcomes is required to become an RPE. After the basic RPE-training it is possible to follow the high level RPE-training course, which can be mandatory depending on the type of practice. The RPE-training courses (basic and high level) are taught at training centers such as universities or private institutions that are accredited by the ANVS. Passing the exam results in the required diploma to become an RPE at basic or high level. There is no specific educational entrance level for the RPE-training courses. However, the training is at a higher vocational level or university level (estimated EQF 6-7). The amount of working experience to become an RPE is not specified in regulations. Retraining of the RPE (basic and high level) is regulated and documented through the formal recognition requirements.

Recognition of services and experts

Services and experts are formally recognised when their registration in a central register is accepted by the responsible authority. For acceptance in the central register, services and experts must comply to acceptance criteria. The central register for the formal recognition of occupational health services, the national dosimetry service, and RPEs is kept by the Competent Authority. The Ministry of Health is responsible for the recognition of the MPE. Recognition of the RPO is not required. For the first registration as an RPE (basic or high level) in the central register an RPE-diploma from an accredited training center is required. After 5 years the RPE is required to re-register. For re-registration of the RPE, evidence should be provided on the required minimum amount of working experience as well as training points that has been acquired every year. Re-registration is again valid for 5 years. There is no system for mutual or bilateral recognition in place. RPEs from other member states can apply for registration via a special recognition procedure, by showing the Competent Authority that their qualifications are equal to the formal recognition requirements. If necessary, the Competent Authority may require the RPE to undergo additional training or passing an admission exam.

	Radiation Protection Expert	Radiation Protection Officer
Implementation	Yes	Yes
National terminology	Stralingsbeschermingsdeskundige (SBD)	Toezichthoudend Medewerker Stralingsbescherming (TMS)
Translation	Radiation Protection Expert	Supervisory Officer Radiation Protection
Role	Provide advice or supervise the compliance with legal requirements	Local supervision or performance of radiation protection tasks
Types or levels	SBD-I SBD-II	1) medical applications 2) dentistry 3) veterinary applications 4) nuclear fuel cycles 5) open sources 6) NORM 7) accelerators 8) industrial radiography 9) gauging techniques
Recognition	Yes	No

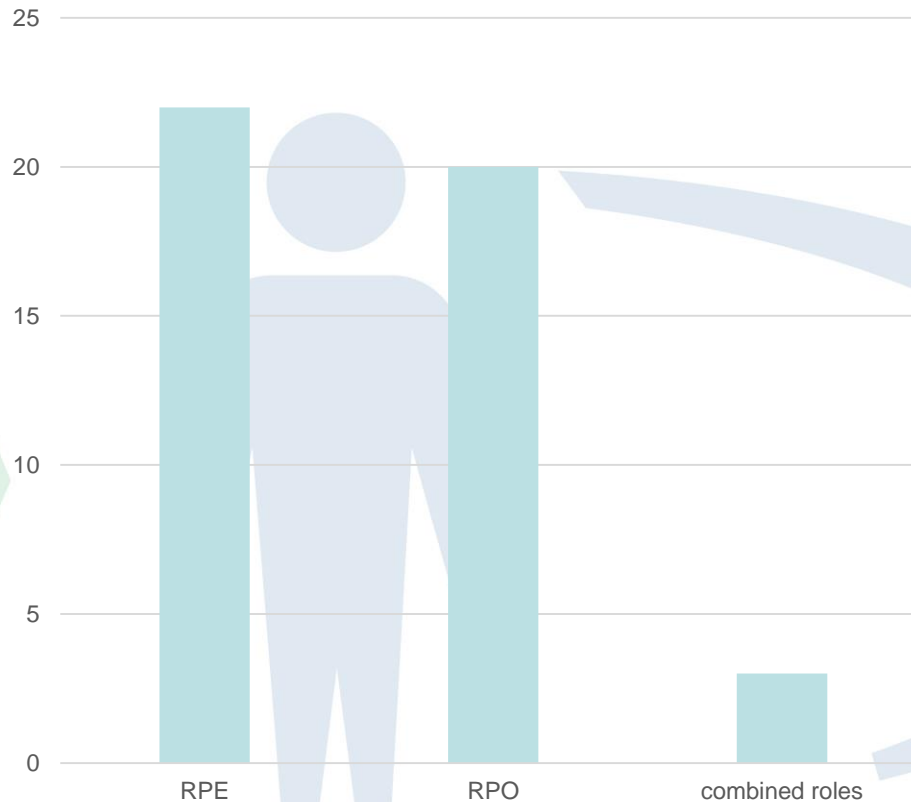
RPO tasks

Possible tasks of the RPO may include the topics mentioned in the BSS (article 84.2), such as to ensure that work with radiation is carried out in accordance with radiation protection requirements, supervision of workplace monitoring etc. The RPO cooperates and liaises with the RPE. The task of RPO can be carried out by a Radiation Protection Unit or RPE.

RPO education, training & retraining

A specific RPO-training course with specified learning outcomes is required to become an RPO. The training is taught at accredited training centers such as universities or private institutions. Passing the exam results in the required diploma to become an RPO. The required level of training, competences and learning outcomes of the RPO are proportional to the risk and complexity of the practices, which are 1) medical applications, 2) dentistry, 3) veterinary applications, 4) nuclear fuel cycles, 5) open sources, 6) NORM, 7) accelerators, 8) industrial radiography (including non-destructive testing and exploration research), 9) gauging techniques. There is no specific educational entrance level for the RPO-training. The level of training depends on the type of practice (estimated EQF 4-7). The amount of working experience to become an RPO is not specified in regulations. Retraining of the RPO is provided and documented by the undertaking. The content and frequency of the (documented) retraining is established by the relevant trade association, with a minimum of one retraining per 5 years.


Figure 1: Implementation of RPE and RPO in HERCA MS



- RPE: 22/25 countries,
- RPO: 20/25 countries,
- combined roles 3/25 countries

Recognition arrangements

- RPE: 24 of 25 HERCA MS
- RPO: 10 of 25 HERCA MS



I am a recognized expert giving radiation protection advice



I supervise specific applications with ionizing radiation

Figure 2: Number of Categories of RPE in HERCA MS

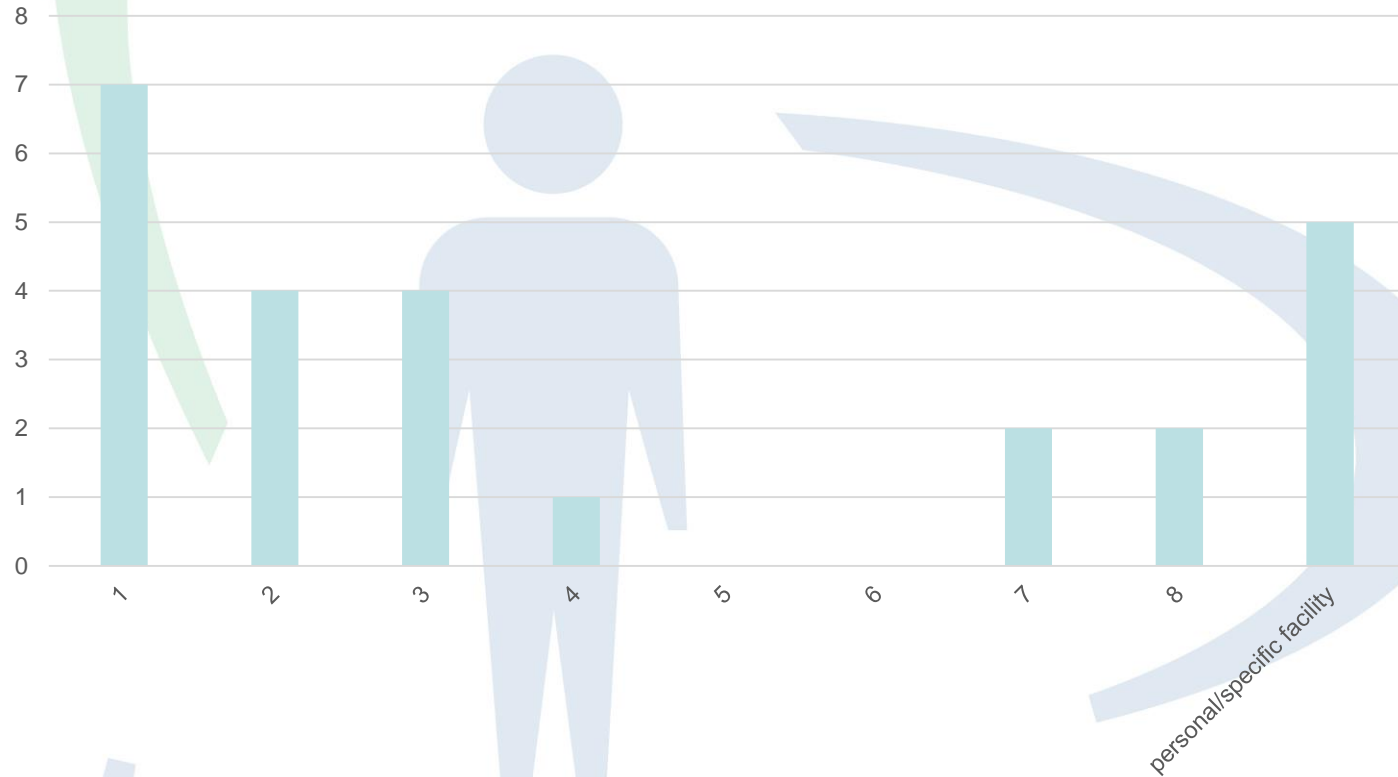
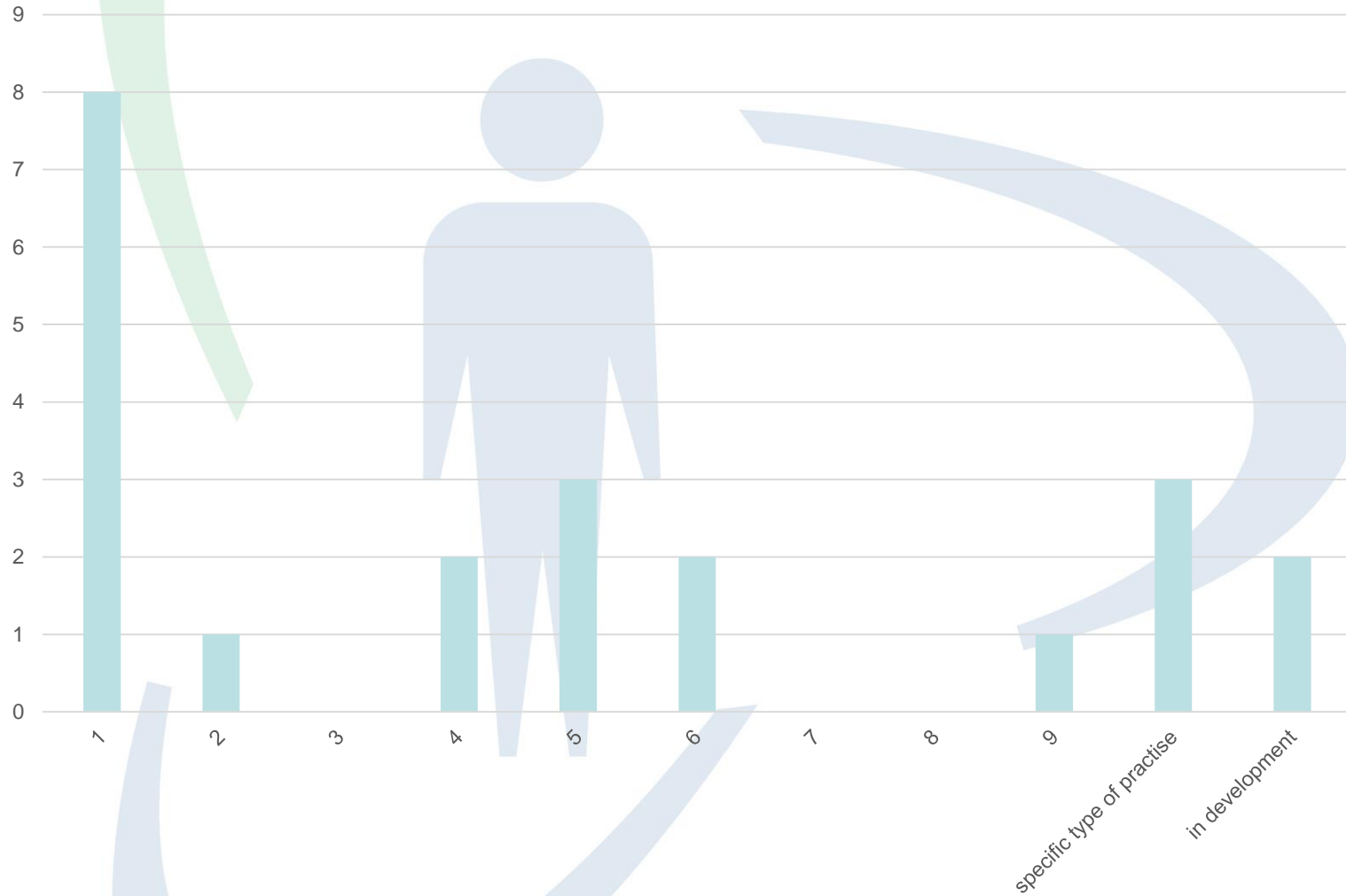


Figure 3: Number of Categories of RPO in HERCA MS



Legal requirements and COVID-19

- In most countries participating in the last HERCA WG E&T meeting ongoing education and training, mostly on line
- Requirements in national rules and regulations may prohibit online education, and/or examinations.
- Requirements for face to face examination for recognition RPE



Legal requirements and COVID-19

- Problems are encountered with
 - Online education (life preferred)
 - Practicals (online/hybrid/life)
 - Online examinations
 - Recognition (FtF)



Questions

