



RP CoP015: Classified Persons

Introduction

This Code of Practice (CoP) explains what Classified Persons are, what arrangements are necessary for classification, and how the University of Edinburgh undertakes these arrangements.

What is a Classified Person?

The radiation exposure of persons who may be working with, or affected by, ionising radiation is limited by law to a set of prescribed radiation exposure levels called Dose Limits.

The dose limits for persons aged eighteen or over are shown in column 2 of table 1 below. As part of the system of protection, those who are exposed, or are likely to be exposed (including taking into account reasonably foreseeable accident situations), to more than three-tenths of these limits (Table 1, column 3) are subject to additional control measures, and must be designated as “Classified Persons”.

| Part of the body | Annual Dose Limit (mSv/y) | Annual Doses above which classification would be necessary (mSv/y) |
|----------------------------------|---------------------------|--|
| Whole Body | 20 | 6 |
| Lens of the Eye | 20 | 15 |
| Skin | 500 | 150 |
| Hands, forearms, feet and ankles | 500 | 150 |

Table 1: Dose Limits for employees and trainees of 18y and above

The vast majority of the University’s work with radiation is low risk and the University aims to keep whole body effective doses below 1mSv per year, and equivalent doses well below those in Table 1, column 3, for routine work.

Therefore, the vast majority of persons working with ionising radiation at the University do NOT need to be designated as Classified Persons.

In a small limited number of cases, the dose estimates from reasonably foreseeable accident situations, done as part of the radiation risk assessment, may indicate doses above those values in Table 1, Column 3 could occur. In these cases, persons may need to be designated as Classified Persons. It is for the employer to decide whether an employee needs to be classified, taking into account the risk assessment and the advice of his Radiation Protection Adviser (RPA). Persons who may think they need to be designated as a Classified Person must therefore contact the University RPA.



What is a Category 'A' or Category 'B' worker?

In some cases, staff and students may work with sources of ionising radiation which are outside the UK. RP CoP016 "Research work involving ionising radiation sources outside the UK" covers the general arrangements for this.

Due to the different legislation, other European Union Member States use the definitions "Category A" and "Category B" workers instead of Classified and non-classified Persons. Category A workers are equivalent to a Classified Person in the UK, Category B workers are equivalent to a non-classified person in the UK.

Therefore, in most cases, persons working with ionising radiation sources outside the UK will be Category B workers (i.e. non-classified).

Arrangements for classification

As Classified Persons are considered to be at a greater risk than non-classified persons (due to increased risk of dose), additional arrangements are required under the Ionising Radiations Regulations 2017 (IRR17). These additional arrangements can be summarised as:

- The mandatory provision of **personal dosimetry**;
- The **assessment of doses** and making/maintenance of dose records by an Approved Dosimetry Service; and
- The mandatory provision of suitable **medical surveillance**.

These three additional arrangements are discussed in more detail below.

Personal Dosimetry

Due to the requirements of IRR17, continuous personal dosimetry must be provided for Classified Persons. This means that dosimeters must be worn at ALL times when working in Controlled Areas (the dosimetry should not be 'paused' part-way through the year if work has stopped for example).

In the majority of cases, persons are designated as Classified Persons due to the risk of external whole body doses exceeding 6mSv/y or the potential for skin contamination doses to exceed 150 mSv from a reasonably foreseeable accident. Suitable personal dosimetry for classified persons in these cases would therefore be:

- A whole-body dosimeter; and/or
- An extremity dosimeter such as a ring/fingerstall dosimeter [where required].

These personal dosimeters can be arranged through your school or department radiation protection supervisor (RPS) or their nominated deputy. For a list of RPSs at the University, please visit: [Radiation Protection Supervisor Contacts](#).



There may be occasions where the risk assessment has identified that internal doses above those in Table 1, column 3 are likely (e.g. in a reasonably foreseeable accident situation). In these cases, suitable personal dosimetry may involve the assay of body fluids (e.g. urine and/or faeces). Early engagement with the University RPA is advised.

Further information on personal dosimetry is given in RP CoP018 "Personal Dosimetry Arrangements".

Assessment of dose and record keeping

The assessment of the doses received by the Classified Persons, and the keeping of their dose records, must be by an Approved Dosimetry Service (ADS). These dosimetry services are subject to an approval process by the Health and Safety Executive (HSE). Examples of ADSs available in the UK are:

- UK Health Security Agency (UKHSA, formerly Public Health England);
- Landauer; and,
- Mirion Technologies Inc.

These ADSs ensure that the employer of the Classified Person is supplied with the dose on the last assessment, the current annual dose to date and their lifetime-accumulated dose.

For Classified Persons only, the ADS also has to send copies of their dose record to the HSE in order to maintain a centralised index of dose information (known as the CIDI database). These dose records are kept for 50 years from the date of the last entry. This is managed by the ADS.

Classified Persons have the right to see their radiation doses and dose records. Local RPSs should make available all radiation doses for persons under their control (not just for classified persons).

The University may only cease treating a person as a Classified Person at the end of a calendar year except where:

- They leave the employment of the University;
- The appointed doctor certifies that the person should not be engaged in work with ionising radiation as a classified person; or
- They are transferred to additional duties that do not involve any significant exposure to ionising radiation (e.g. not exceeding an effective dose of 1mSv per year).

When a person ceases being treated as a Classified Person, they must be provided with a 'Termination Record'. The purpose of this is to provide dose information to any new employer but also to provide the existing employer and employee with their radiation dose received throughout their time as a Classified Person. The



Approved Dosimetry Service provides the termination record after the employer has notified them that the Classified Person is ceasing classification. The RPS or the line manager of the classified person generally does this notification to the ADS.

Once the termination record has been received from the ADS, the University RPU should be informed. They then write to the Occupational Health Service to inform them of the declassification and allow them to close the record.

Lost or damaged dosimeters

There are requirements placed on the employer of Classified Persons by IRR17 Regulation 23 to ensure that an estimated dose (or notional dose) is provided for that classified person in the event of a lost, damaged or destroyed dosimeter. The main requirement is for the employer to carry out an investigation into the lost, damaged or destroyed dosimeter so that they can establish the cause of the loss or damage as well as to make an adequate estimate of the dose received.

Further information on the nature of such an investigation, and personal dosimetry in general, is given in RP CoP018 "Personal Dosimetry Arrangements".

Medical Surveillance

The University, as an employer of Classified Persons, must ensure that they are subject to adequate medical surveillance by a relevant doctor at all times. The relevant doctor, also called an Appointed Doctor, is a registered medical practitioner who meets the criteria set by the Health and Safety Executive (HSE), for the purpose set out in IRR17 (i.e. it cannot be done by any doctor).

The purpose of medical surveillance is to confirm that an individual is fit (or continues to be fit) for the intended work with ionising radiation. Fitness of the person is not just restricted to the possible health effects from exposure to radiation; a number of other factors are taken into account, for example, the fitness of the individual where appropriate:

- To wear any Personal Protective Equipment (including Respiratory Protective Equipment) required to restrict exposure;
- With a skin disease, to undertake work involving unsealed radioactive materials;
- With psychiatric illness or personality disorder, to undertake work with radiation sources that involve a special level of responsibility for safety;
- With a history of chronic pulmonary disease, blood disorder, treatment with cytotoxic drugs, inherited predisposition to cancers, or previous significant medical exposure to ionising radiation.

The University's Occupational Health Service (OHS) administers the medical surveillance on behalf of the University.



In some cases, persons may visit or work in controlled areas outside the UK to carry out research or work on behalf of the University. Due to the entry requirements of the host site, a medical examination may be required. RP CoP016 “Research work involving ionising radiation sources outside the UK” provides further guidance on this.

Medical examination before designation as a Classified Person

In practice, to allow the appointed doctor to adequately assess the person’s fitness to work with ionising radiation, a face-to-face medical examination is required **prior** to being designated as a Classified Person for the first time. This must be arranged by the classified person (or their line manager) directly with the OHS **and** in conjunction with the University RPA and their local RPS.

Note, due to the availability of appointed doctors, a wait of up to 4-6 weeks may be in place for face-to-face medical examinations.

Face to face medical examinations take place at the University’s Occupational Health Service offices at the address below:

| | |
|---|---|
| Occupational Health Service Health and Safety Department The University of Edinburgh Drummond Street Annexe Drummond Street Edinburgh EH8 9XP. | Tel: 0131 650 8190 Email: Occupational.Health@ed.ac.uk |
|---|---|

Periodic reviews of Health

After the initial medical examination prior to classification, periodic reviews of health must then take place at least once a year (also called a ‘Classified Medical’). The regulations do allow some flexibility in the review date and it can take place up to one month before or one month after the due date and be treated as having been carried out 12 months since the last review. The appointed doctor may also specify a shorter period between reviews if they so wish.

The OHS contact Classified Persons in plenty time ahead of their review. This should allow the classified persons sufficient time to allow them to gather the information required to be made available to the appointed doctor (see next section).

The format of the review is decided by the appointed doctor taking into account any guidance issued to appointed doctors by the HSE [[Guidance for Appointed Doctors](#)]. Typically the University’s Appointed Doctors carry out ‘paper’ reviews or ‘face-to-face’ reviews as part of the periodic review of health of the University’s classified persons (for example a face-to-face review may only need to be carried out every 3 years).



Both paper and face-to-face reviews will involve at least an assessment of the workers dose and their sickness absence over the last period (e.g. 12 months). This data must be verifiable, please see the next section on 'information to be made available' to the OHS. The review may also involve looking at monitoring records of the working area (e.g. contamination monitoring or environmental dose monitoring).

In some cases, the periodic review of health may also involve an interview with the individual (e.g. in-person) and occasionally a medical examination/medical tests.

The University must allow time away from their day-to-day work during working hours for the classified person to attend their classified medical.

Classified persons must also make the appointed doctor aware of any changes to their health to ensure they continue to be fit to work with ionising radiation. A few examples are given below (note, this list is not intended to be exhaustive):

- You have declared to your employer that you are pregnant;
- You have developed a condition which may impact on your work with ionising radiation that requires you to be classified.

Further information on working with ionising radiation when pregnant or breast-feeding is given in RP CoP013 "Working with Radiation when Pregnant or Breastfeeding".

Information to be made available to the appointed doctor

Classified Persons must ensure they provide the appointed doctor with the information below **prior to** their classified medical appointment. In some cases, the local RPS for the area may assist with the gathering of the information below but the onus is on the Classified Person to do this.

As the Occupational Health Service administer the classified appointments on behalf of the University, this information must be sent to them directly. The University OHS will only make you an in-person appointment with the appointed doctor **on receipt of the requested information in 1-3 below.**

| Information required | How obtained |
|---|--|
| 1. Your last 12 months Sickness Absence Record | Staff: These details must be verifiable. A screenshot of your sickness absence from 'People & Money' or an email from your local HR contact is acceptable. PhD Students: A signed letter or email from your line manager is required confirming this information. |
| 2. Results of your dose monitoring for the past 12 months | This must be submitted to the OHS as an official dose report from your Approved Dosimetry Service. The OHS cannot accept local Excel spreadsheets using |



| Information required | How obtained |
|---|---|
| | downloaded data as this could easily be manipulated and the results falsified to pass the medical. You should contact your approved dosimetry service directly for a Dose Report or seek help from your local Radiation Protection Supervisor. |
| 3. A copy of your Health Record | See section on health records below. The latest version of your Health Record can be downloaded from the University's COSHH Health Passport System (CHPS) and taken along to the appointment. |
| 4. Advice on changes to health conditions | Advice regarding any health condition(s) that may have worsened or changed since the last assessment by the appointed doctor, including updated information for existing medical conditions. This can be provided verbally at the review. |
| 5. Any change of duties | Any significant change of duties that may affect the nature of the work for which you are being classified. This can be provided verbally at the review. |

Health Records

Schedule 6 of the IRR17 contains all the particulars that must be contained in a health record. A suggested health record form has been prepared by the HSE and this can be found here [[HSE F2067 Health Record Form](#)]. Note, the Health Record **does not** contain any confidential clinical information.

Part A of the form contains general details about the employer, the employee and information about the Approved Dosimetry Service. Part B is filled in by the appointed doctor and is intended to be a live record; i.e. a new line added to after each periodic review.

It is the responsibility of the employer to keep the health record, not the Occupational Health Service (note, the OHS keep a record of any confidential clinical information as recorded in form [FODMS101](#)).

COSHH Health Passport System (CHPS)

The University, as the employer of the Classified Person, has decided to keep the Health Records for Classified Persons on the University's online COSHH Health Passport System (CHPS). By keeping the Health Record on CHPS, Classified Persons



can access and download the latest version of their Health Record to take along to their appointment.

For access to the CHPS system click the Quick Link marked COSHH Health Passport System at: <https://www.ed.ac.uk/health-safety> . EASE Login is required.

Following the appointment, the OHS will email the University Radiation Protection Adviser with the newly updated Health Record which can be uploaded to the CHPS system. This updated record would then be downloaded by the Classified Person and taken to the next appointment and so on.

The Health Record, or a copy of it, must be kept until the Classified Person has (or would have) reached the age of 75, but in any event for at least 30 years from the date of the last entry. By keeping the Health Record in CHPS, this ensures these retention requirements from IRR17 are met.

Radiation Passbooks for Classified Persons

Radiation Passbooks are supplied and issued by the Approved Dosimetry Service to Classified Persons who are also Classified Outside Workers. A Classified Outside worker is a Classified Person who carries out 'services' in the Controlled Area of any employer (other than a controlled area designated by their own employer).

Carrying out services implies providing a benefit to the other employer responsible for that Controlled Area. Whilst not explicitly defined, it is assumed that services does not include visits or walk-rounds where there is no physical 'work' with ionising radiation taking place. The University therefore does not expect its Classified Persons to be carrying out services in Controlled Areas designated by other employers such that they need to be supplied with a Radiation Passbook as a Classified Outside worker.

Document version

| Version number | Summary of change | Date and by whom |
|----------------|--|--------------------------|
| 2.0 | Updated arrangements for medical surveillance including information to be provided to OHS ahead of medicals. | 07/12/2022 Mark Green |
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Appendix 1: Summary Flowchart for Classification

