

GL258: Guidance for school employers undertaking registration of the use of school-science radioactive teaching sources

The following is CLEAPSS guidance for school employers undertaking registration for radioactive sources used in school science. Since 6th February 2018, employers who have employees using radioactive sources must notify, register or obtain consent from the HSE before working with the sources. School employers who have science departments using typical school teaching sources will need to register. If your employer has not done this, our advice is to get the registration undertaken promptly, even if late. The HSE will take a very dim view if, once your employer has realised that the registration is needed, it is then ignored.

The HSE online registration system could be amended at any time. Keep this in mind when reading this guide. We will amend our guidance as we become aware of changes.

Introduction

The 2017 Ionising Radiations Regulations have a 'graded approach' in which there are three bands of risk, requiring notification, registration or consent. School employers whose schools hold typical school-science teaching sources come within the medium-risk band¹ and will need to undertake registration. Sources include sets of geological samples from suppliers such as Philip Harris. (Note that typical school sources have always been medium-risk. The risk is based on levels set by the International Atomic Energy Authority which is why you had to notify the HSE under the old 1999 regulations and appoint an RPA. The risk is made low by following L93.)

Registration is the responsibility of the employer (if you are unsure who your employer is, please see section 3 of CLEAPSS guide L93 which is free to download from <http://science.cleapss.org.uk>). Schools should not simply assume the employer is the school head or governing body. Make sure you are authorised to answer on behalf of your employer. We advise that the person completing the registration has written authorisation from the employer to do this, eg an email or memo.

It is the employer's details and type of practice(s) that are registered, not the sources that are held (the registration process does not ask for any list of sources) hence the employer needs to register just once, even if the employer has many sites. The registration does not have to be done again unless there is a significant change in employer's details or practice with ionising radiations, in which case a new registration needs to be undertaken. *See the note at the end of this guidance note about this.*

Registration costs £25 except for NI where there is no charge. The £25 is made by the HSE, not CLEAPSS!

¹ Medium risk is where the total holding of each of the following radionuclides exceeds the relevant threshold: eg for americium-241, plutonium-239, radium-226, strontium-90, caesium-137, depleted uranium and compounds: 10 kBq; for cobalt-60: 100 kBq; for thorium compounds: 1 kBq. Contact CLEAPSS for other radionuclides. There is also a summation rule if there is more than one radionuclide involved which is generally the case for school science. The Standard School Holding (see L93) is greatly below the threshold for high risk.

Where to go to start the registration

For England, Wales and Scotland, the online registration can be found at www.hse.gov.uk/radiation/ionising/notification-process.htm and follow the links. School employers in Scotland should follow the guidance from SSERC (www.sserc.org.uk)

For England, Wales and Scotland, first you have to create an account. We recommend you use your work email, contact number and (optionally) address details, not personal ones. You will be sent an email. Follow the link in the email to confirm your email address and proceed with your application. Once you have created an account successfully, you can start the registration process.

The HSE has produced guidance for the notification, registration and consent process. It is at https://webcommunities.hse.gov.uk/gf2.ti/f/19618/666661.1/PDF/-/Ionising_Radiations_Regulations_2017__Guidance_for_Notifications_Registrations_and_Consents.pdf

For Northern Ireland, application for registration is by the HSENI Word questionnaire with checkboxes; a cross can be entered using the checkbox function of Word; download the questionnaire from

www.hseni.gov.uk/publications/irnni17-questionnaire-form. There is no requirement to create an account.

The completed document needs to be returned to: mail@hseni.gov.uk HSENI guidance is on www.hseni.gov.uk/articles/ionising-radiation

The registration process.

The following guidance on answers for the HSE online registration process applies to the HSENI Word questionnaire too. Note that the question numbers on the NI questionnaire do not tally with the HSE online registration numbering.

Note: when we registered online, on some parts we could not see an obvious way to go back and make changes once they had been completed. Make sure of your answers. You can always sign out at any time and resume your application later.

If you make a mistake and you are unable to correct it, sign out, then sign in, and just start a new application. See the screenshot below. The HSE has said that unfinished applications will just be deleted after 30 days. You can't delete the unfinished application yourself.

Digital Services SIGN OUT >
Ralph Whitcher

BETA This is a new service – your [feedback](#) will help us to improve it.

[Digital services](#) > [Ionising radiation](#) > [Your application](#) > Your applications

Your applications

Application number	Customer	Representative	Status	Created On ↑	
DEC-01481-D8T5B5-WT51	CLEAPSS	Ralph Whitcher	In progress	03/01/2018 3:25 PM	
DEC-01481-D8T5B5-W3Z1	CLEAPSS	Ralph Whitcher	In progress	03/01/2018 3:03 PM	

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(The red arrow shows a new application. The old one will be deleted after 30 days)

On the online process, choose 'Start new application'. This will go to **Step 1: Your employer and ionising radiation**

- *Q 1 of 6. Which of the following best describes your employer?*

For Local Authorities, select 'Local authority'. For Multi-academy Trusts, these generally hold charity status, but check this. All other educational establishments, 'Education' would be the most appropriate response.

- *Q2 of 6. Does your employer have a company registration, school or charity number?*

In our testing, we found that standard DfE and Welsh government six-digit school unique reference numbers were not recognised. Our best success was to move on to the next page and search just on the post code – do not enter your organisation's name. Local authority head offices failed to materialise in our searches.

If your employer is not found in the database, do not select the nearest-fit. Go to 'Continue' and select 'yes' to 'Would you like to add your employer's details yourself?' and enter your employer's details accurately. If you select 'no' your application will be ended. We accepted that our registration could be delayed because it would have to be checked manually by the HSE (in fairness, the delay for us was minimal, but that may not be the case generally).

- *Q3 of 6. How many employees (in Great Britain) does your employer have?*

You are given several ranges to choose from. This is the number of people employed by your employer, not necessarily the number of people employed at your establishment. It is a head count, not full-time equivalent. Don't include volunteers or contractors.

- *Q3 of 6. [sic] How many are classified radiation employees?*

For school science work, this is zero. 'Classified radiation employee' has a specific meaning in the regulations and does not apply to schools

- *Q4 of 6. Do you transport radioactive substances either as your main work or in connection with it? (This doesn't apply to X-ray devices.)*

This should normally be 'no'. There are a few cases of split-site campuses separated by public roads where the sources are planned to be transported periodically, in which case answer 'yes'.

- *Q5 of 6 Does your employer carry out work with portable ionising radiation sources (this includes X-ray devices) at sites belonging to other employers?*

This should normally be 'no'. CLEAPSS would not expect the school science sources to be taken to other employer's sites.

- *Q6 of 6 How many fixed sites (in Great Britain) is your employer responsible for where they carry out work with ionising radiation?*

For local authorities and MATs, this is the number of schools that hold radioactive sources for which the LA or MAT is the employer. For single educational establishments, it is one (or possibly two if it is a split-site campus, both sites holding sources, and each site has a different post code.)

England, Wales and Scotland only: You then get to **Step 2: working with ionising radiation**

Notify

There is **no charge** to notify

- Notify working with naturally occurring radionuclides which are not processed for their radioactive, fissile or fertile properties
- Notify working in an atmosphere containing radon above an annual concentration of 300 Bq per cubic metre
- Notify working with artificial radionuclides and/or naturally occurring radionuclides which are processed for their radioactive, fissile or fertile properties

Register

There is a single charge of **£25** to register for **any number of** activities.

- Register working with naturally occurring radionuclides which are not processed for their radioactive, fissile or fertile properties
- Register working with a radiation generator (for example, X-ray devices)
- Register working with artificial radionuclides and/or naturally occurring radionuclides which are processed for their radioactive, fissile or fertile properties

Get consent

There is a charge of **£25 for each** consent.

- The deliberate administration of radioactive substances to people or animals for medical or veterinary diagnosis, treatment or research
- The deliberate addition of radioactive substances in the production or manufacture of consumer products or other products, including medicinal products.
- Industrial irradiation
- Industrial radiography
- Working with a high-activity sealed source (HASS) (except for industrial radiography or industrial irradiation purposes)
- Discharging significant amounts of radioactive material with airborne or liquid effluent into the environment
- Operation of an accelerator (except when operated for industrial radiography or industrial irradiation purposes and except an electron microscope)

In step 2, you need to select all the boxes that apply. There are two most likely.

1. For school-science teaching sources, tick the box 'Register working with artificial radionuclides and/or naturally occurring radionuclides which are processed for their radioactive, fissile or fertile properties' in the 'Register' section. [note that 'processed' here refers to the origin of such radionuclides, not that the employer is necessarily processing the radionuclides.]. This tick box also covers use of small sets of radioactive rock specimens.
2. If in your radon assessment* you have identified you have places of work in which the annual radon concentration is above 300 Bq m⁻³, then also tick the box 'Notify working in an atmosphere containing radon above an annual concentration of 300 Bq per cubic metre' in the 'Notify' section.

If you are uncertain whether other tick boxes apply to your employer, contact CLEAPSS.

On the NI questionnaire, Q10 relates to radon assessments, and the asterisked note as follows also applies.

(* If your employer has buildings in a high-risk radon area, or places that can have elevated radon levels, eg unventilated basements, and has not undertaken a radon assessment, then just register the school sources initially. The employer should contact an RPA for guidance and if advised, undertake a

suitable radon survey and assessment without undue delay. If radon levels turn out to be above an annual average of 300 Bq m⁻³, then complete a separate online notification (by questionnaire in NI) and carry out the remedial measures from the radon assessment. There is no charge for notification.)

On the online process, you then get to the listing of your activities. 'Notify' will appear if you ticked the radon box previously. Click on 'Register' and then 'Save and continue' that subsequently appears.

Step 2: Work with ionising radiation

- Please ensure all activities on this page are completed before proceeding to the next step.
- You can complete an activity by clicking on its name and going through the list of questions.
- You can add a new activity by clicking the 'Add or Remove activity' button.

Activity	Type	Status ↑	Created On
Register	Registration	In progress	03/01/2018 3:41 PM 
Notify	Notification	In progress	03/01/2018 3:41 PM 

[Add or Remove activity](#)

[Finish my application >](#)

You are then taken to a declaration page in which you must confirm the statements are true by ticking a box.

The following (see next page) is a copy of the statements you are asked to confirm on behalf of your employer. Read carefully our guidance notes in the text box, which are in square brackets in red. If the employer is adhering to CLEAPSS guide L93, then the statements can be confirmed confidently.

Make sure your answers to these statements are true. (For England, Wales and Scotland, your name appears on the final registration certificate as the person who has asserted this.) If you answer falsely, you could be personally liable as well as your employer.

Some of these statements do not apply to schools, eg the work does not require supervised or controlled areas. These statements contain the phrase "where required", so, if they are not required, the HSE says it is correct to confirm that the employer has met the regulatory requirement. This applies to Q17 & 18 on the NI Word questionnaire where there is no option for not 'applicable', so 'Yes' is the appropriate response owing to the phrase "where required".

- A risk assessment has been completed which identifies the main radiological risks associated with the work with ionising radiation and identifies any reasonably foreseeable radiation accident. [L93 provides the risk assessments]
- Steps have been taken to measure or estimate employees' exposure to ionising radiation and appropriate action taken. [The procedures in L93 are the steps taken to estimate and minimise employees' exposure]
- Actions identified in your radiation risk assessment that will restrict employees' and other persons' exposure to ionising radiation so far as is reasonably practicable have been completed. [True if the employer has implemented all the relevant actions in L93]
- Contingency plans have been drawn up for all reasonably foreseeable radiation accidents identified in the radiation risk assessment and, where appropriate, rehearsals will be carried out at suitable intervals. [Contingency plans have been drawn up in L93 section 9. Rehearsals are not appropriate]
- A suitable radiation protection adviser (RPA) has been appointed and consulted. [This is where some school employers may be deficient. For example, this can be overlooked by LA schools converting to academies. Check your employer has appointed a qualified suitable RPA. Check the RPA has a current HSE-recognised certificate of competence]
- Appropriate training, information and instruction is provided to all employees engaged in or affected by work with ionising radiation and will be repeated at appropriate intervals. [A science teacher, assigned as the radiation protection supervisor(schools), who understands the basic principles of radiological protection and the relevant legal requirements explained in L93, can give appropriate instruction and training to other science staff. CLEAPSS strongly recommends this person has attended a course specifically designed for school work with ionising radiations.]
- Controlled and/or supervised areas have been correctly designated and demarcated. [Not required for school radioactive sources specified in L93]
- Written local rules have been drawn up, where required, and radiation protection supervisor(s) are appointed for all your work in controlled areas and, where appropriate, supervised areas. [For typical school sources, schools do not require controlled and supervised areas and the associated local rules. Although radiation protection supervisors are not required, the similarly-named but distinct radiation protection supervisor(schools) is a requirement of L93 and should be in place]

If you have ticked radon in working with ionising radiation, you will be taken back to the 'Finish my application' page where you will have to select 'Notify' and answer a question on radon.

For England, Wales and Scotland, you will then be taken to the payment stage to pay the registration charge. There are two options, credit card or Paypal. If the transaction can only be carried out by a financial officer, bursar, etc. then you can sign out, then sign in at computer attended by the authorised paying person. When the employer's details you provided have been successfully validated, you will receive an email and your declaration documentation will be available to view and download from the online system.

For NI, you should email your questionnaire to HSENI and keep a copy of the information you've provided. An acknowledgement certificate will be emailed to you. Keep this securely in your records.

When you receive a message that your registration application has been successful (not applicable to NI)

1. Download and print the registration documents, and keep them securely.
2. The way the registration system is set up presently, if your employer needs to amend the registration in future, it is done online. The only person who can log in to make the amendment is you, the person who made the initial application. That is not much use to the employer if you have left the organisation. When you receive a message that your registration application has been successful, we suggest you log in, go to 'your profile', and change the email address to an accessible one (eg office@yourschool.sch.uk). Someone will need to access the new email address to click on the link to validate it. The changed email becomes the new login id; lodge the new id and password securely with an appropriate senior person in the organisation.