

SOP for Outside Workers

Issue Date	Review Date	Version
July 2019	July 2024	1

Purpose

This document describes the procedures required for Outside Workers entering a Controlled or Supervised Area operated by University Hospitals Plymouth NHS Trust (UHPNT).

It also describes procedures for Trust staff entering Controlled or Supervised Areas outside of UHPNT.

The policy provides instructions to ensure compliance for Outside Worker requirements under the Ionising Radiations Regulations 2017.

Who should read this document?

Staff in charge of Controlled or Supervised Areas.

Managers responsible for locations where Controlled Areas or Supervised Areas are designated.

Staff responsible for Trust Outside Workers providing services to other employers.

Key Messages

An Outside Worker is an employee who carries out services in a Controlled or Supervised Area under the control of another organisation. Controlled and Supervised Areas are areas designated where ionising radiations (x-rays and/or radioactive substances) are in use and there is a risk of radiation exposure or contamination.

Outside Workers can be both Classified Outside Workers and Non-Classified Outside Workers. Specific arrangements are required before any Outside Worker carries out services in any Controlled or Supervised Area.

Carrying out services implies providing a benefit to the employer. Examples include medical staff from another organisation proctoring staff in a new technique, where the work undertaken is in a Controlled or Supervised Area.

Prior to entry of any Outside Worker into a Controlled or Supervised Area, the instructions in this procedure must be followed. This will require work to be carried out in advance of any such Outside Worker requiring access to a Controlled or Supervised Area.

Core accountabilities	
Owner	Katherine Deburgh
Review	Radiation Safety Committee
Ratification	Medical Director – Phil Hughes
Dissemination (Raising Awareness)	Katherine Deburgh
Compliance	Radiation Safety Committee
Links to other policies and procedures	
Radiation Safety Policy	
Version History	
1	July 2019

The Trust is committed to creating a fully inclusive and accessible service. Making equality and diversity an integral part of the business will enable us to enhance the services we deliver and better meet the needs of patients and staff. We will treat people with dignity and respect, promote equality and diversity and eliminate all forms of discrimination, regardless of (but not limited to) age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage/civil partnership and pregnancy/maternity.

An electronic version of this document is available in the Document Library. Larger text, Braille and Audio versions can be made available upon request.

Standard Operating Procedures are designed to promote consistency in delivery, to the required quality standards, across the Trust. They should be regarded as a key element of the training provision for staff to help them to deliver their roles and responsibilities.

Section	Description
1	Introduction
2	Definitions
3	Regulatory Background
4	Key Duties
5	Procedure to Follow
6	Document Ratification Process
7	Dissemination and Implementation
8	Monitoring and Assurance
9	Reference Material
Appendices	
	Required Documentation

Standard Operating Procedure (SOP)
Standard Operating Procedure for Outside Workers

1 Introduction

Outside Workers may be at particular risk, as they may be unfamiliar with the local procedures, rules, hazards and risks.

Prior to entry of any Outside Worker into Trust Controlled or Supervised areas, or prior to entry of any Trust Outside Worker into Controlled or Supervised areas operated by other organisations, the instructions in this procedure must be followed, and this requires work to be carried out in advance of any such Outside Worker requiring access to a Controlled or Supervised Area.

2 Definitions

“Non-Classified Outside Worker” means a person, who is not an employee of the organisation, and who is not a classified person, who carries out services in a Supervised or Controlled area under the control of the organisation.

“Classified Outside Worker” means a classified person, who is not an employee of the organisation, who carries out services in a Supervised or Controlled area under the control of the organisation.

“Carrying out services” implies providing a benefit to the organisation.

“Organisation” in this respect is the employer in charge of the Controlled or Supervised Area.

3 Regulatory Background

The Ionising Radiations Regulations 2017 impose specific requirements for Outside Workers (Regulations 8, 9, 13, 15, 16, 18, 19, and 20). This requires co-operation between respective employers (Regulation 16).

4 Key Duties

Managers of locations where Controlled and Supervised Areas are designated must ensure that requirements for Outside Workers are identified in advance and arrangements implemented prior to any Outside Worker entering the Controlled or Supervised Area, including the provision of any training and instruction required.

Managers of staff responsible for Trust employees acting as Outside Workers for other employers must ensure that requirements for Outside Workers are identified in advance and arrangements implemented prior to the Outside Worker entering the Controlled or Supervised Area, including the provision of any training and instruction required.

Radiation Protection Supervisors are responsible for compliance with Local Rules which govern entry to Controlled or Supervised Areas, including entry of Outside Workers.

The Clinical & Radiation Physics service is responsible for conducting relevant aspects of cooperation between the Trust and other employers.

5 Procedure to Follow

Notification of Requirement for Outside Workers

Service Lines must ensure that any requirement for work by any Outside Worker is notified to the Clinical & Radiation Physics service at least 10 working days prior to the work commencing (L121 paragraph 290). This applies for both Outside Workers providing services in a Trust Controlled and / or Supervised Area and for Trust workers providing services in another employer's Controlled and / or Supervised Area.

Where such work is a requirement of contracts or agreements between the Trust and other employers e.g. provision of maintenance under a service contract, the arrangements must be considered as part of the contract discussions (L121 paragraph 291).

Forms TRW.H&S.FOR.1220 *Access Request Form for Outside Worker* and TRW.H&S.FOR.1221 *Notification of Employee Carrying Out Services as an Outside Worker* should be used to notify the Clinical & Radiation Physics service of Outside Worker requirements. The forms are made available electronically and should be e-mailed to *plh-tr.DosimetryService@nhs.net*.

Cooperation between Employers

On receipt of the form, the Clinical & Radiation Physics service will contact the outside employer as part of co-operation requirements (Regulation 16). The form can also be used as part of cooperation agreements for Trust staff acting as Outside Workers in other employers' Controlled and Supervised Areas. The following information will be required in both instances:

- (a) the detail of the actual work to be carried out;
- (b) the type of likely radiation exposure;
- (c) an estimate of the total dose likely to arise from the work;
- (d) the work procedures that will be required to keep doses as low as reasonably practicable (including any use of special protective equipment);
- (e) the risks associated with the work and the precautions that should be taken;
- (f) any local restrictions that will be applied;
- (g) the local rules that apply (including emergency arrangements and contingency plans);
- (h) radiation protection supervisor (RPS) appointments;
- (i) any relevant dose constraints and associated local investigation levels.

In addition the following information should be exchanged / agreed:

- Monitoring requirements for the Outside Worker, including any additional dose assessment required for the work e.g. electronic personal dosimeter (EPD).
- Emergency contacts if work is outside normal hours (L121 paragraph 296).

Classified Outside Workers

Where the Outside Worker is a Classified Person, additional arrangements are required (Regulation 19(3)), this includes;

- (a) their radiation passbook is up to date and contains the required information;
- (b) they have received the necessary training;
- (c) they have been passed fit by the relevant doctor to undertake the work with ionising radiation;
- (d) they are subject to routine dose assessment by an Approved Dosimetry Service.

Clinical & Radiation Physics are responsible for updating radiation passbooks for Trust Classified Persons who are required to work in another employer's Controlled or Supervised Area, and also for any Classified Persons from another organisation who act as an Outside Worker within the Trust.

Granting of Access of Outside Workers into Trust Controlled and Supervised Areas

Once prior arrangements are in place, the Clinical & Radiation Physics service will notify the relevant Service Line of the required arrangements. This will be copied to the relevant Radiation Protection Supervisor.

The requesting Service Line is responsible for implementing the arrangements, including ensuring training and information is provided, and this is documented.

The Radiation Protection Supervisor must be satisfied Local Rules are adhered to, which includes access for Outside Workers.

Outside workers will follow a process of induction which will include familiarity with the local rules, contingency plans, local policies and procedures and where relevant risk assessments. Induction training will be delivered and recorded locally within the Service Line.

Access at Short Notice

It is recognised that on occasion an Outside Worker may require access at short notice. This must be considered an exceptional circumstance where for

urgent patient care there is likely to be significant detriment to the individual patient if access is not granted. This does not include any planned or elective work.

In such circumstances, for the benefit of the individual patient concerned, access to the Controlled Area may be granted for the individual patient's treatment. Instruction and training must be given and recorded, using the briefing notes, and the individual supervised at all times when working in the Controlled Area.

In such circumstances a Datix incident must be raised as this situation will not be fully compliant with the requirements of the regulations.

Examples of Outside Workers

Locum Staff

Visiting staff carrying out training / mentoring

Company representatives providing instruction and training

Students on Placement

External maintenance engineers (where the Controlled or Supervised Area is not under the Company's control)

6 Document Ratification Process

The design and process of review and revision of this procedural document will comply with The Development and Management of Formal Documents.

The review period for this document is set as default of five years from the date it was last ratified, or earlier if developments within or external to the Trust indicate the need for a significant revision to the procedures described.

This document will be reviewed by the Radiation Safety Committee and ratified by the Medical Director, or Director for Corporate Business.

Non-significant amendments to this document may be made, under delegated authority from the Medical Director, or Director for Corporate Business, by the nominated author. These must be ratified by the Medical Director, or Director for Corporate Business and should be reported, retrospectively, to the Radiation Safety Committee.

Significant reviews and revisions to this document will include a consultation with named groups, or grades across the Trust. For non-significant amendments, informal consultation will be restricted to named groups, or grades that are directly affected by the proposed changes.

7 Dissemination and Implementation

Following approval and ratification, this procedural document will be published in the Trust's formal documents library and all staff will be notified through the Trust's normal notification process, currently the 'Vital Signs' electronic newsletter.

Document control arrangements will be in accordance with The Development and Management of Formal Documents.

The document author(s) will be responsible for agreeing the training requirements associated with the newly ratified document with the Medical Director, or Director for Corporate Business and for working with the Trust's training function, if required, to arrange for the required training to be delivered.

8 Monitoring and Assurance

Arrangements will be monitored through the Radiation Protection Assurance Process.

The Radiation Protection Assurance Process is conducted by the Clinical & Radiation Physics service, reporting to the Radiation Safety Committee.

Any shortfalls in the process are expected to be identified by staff in control of Controlled and Supervised Areas, Radiation Protection Supervisors, and the Clinical & Radiation Physics service. Where such shortfalls are identified advice will be sought from the Trust Radiation Protection Advisers.

Any concerns will be escalated through management arrangements for Ionising Radiations, including Care Group structures, and the Radiation Safety Committee

9 Reference Material

Ionising Radiations Regulations 2017

Work with Ionising Radiation: Approved Code of Practice and guidance, Ionising Radiations Regulations 2017, L121

TRW.H&S.FOR.1220 Access Request Form for Outside Worker

TRW.H&S.FOR.1221 Notification of Employee Carrying Out Services as an Outside Worker