



Radiation Protection Council

Involvement in the Handling of Complaints, and Guidance to Licensees on Complaints against Registrants and Licensing

Version 1.3	<i>RPC Involvement in the Handling of Complaints, and Guidance to Licensees on Complaints against Registrants and Licensing</i>	<i>Update agreed 090123</i>	<i>Review: Sept 24</i>	<i>Page 1</i>
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RECORD OF CHANGES

Change N°	Details of Change	Date of Change	Author of Change
V1.0	Original document		
V1.1	Update confirmed by RPC 17/09/19	17/09/19	RPC
V1.2	Combined with cover sheet. Amended for clarity following review by RPC.	05/10/21	RPC
V1.3	Update to correct typographical errors.	09/01/23	RPC

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Introduction

The Society for Radiological Protection (SRP) is a learned Society incorporated by Royal Charter through which it also operates Registers of Chartered, Incorporated and Technical Radiation Protection Professionals (the Registers). The SRP has the authority to admit to, and remove from, these Registers those (the registrants) whom it assesses as being competent radiation protection practitioners and it exercises its powers by delegating to the Radiation Protection Council (RPC), a sub-committee of the SRP Council, its authority to regulate the competence and professional conduct of its registrants by granting, after any due diligence, the right of SRP to admit to, and remove from, the Registers.

The SRP, through the RPC, may not only register its own members who satisfy the requirements for registration as established by RPC and approved by SRP, but also may license related institutions (the licensees) to nominate their relevant members for admission to and removal from the registers.

Removal from the Registers of Chartered, Incorporated and Technical Radiation Protection Professionals

- 1 In respect of removals from the Registers, apart from resignations, this will be following an inquiry by the licensee into complaints made about a registrant's professional competence or professional behaviour.
- 2 The RPC expects all licensees, including the SRP, to require those they register to abide by the licensees' codes of professional conduct and to co-operate with the licensees' professional inquiry procedures including, where appropriate, an appeal procedure.
- 3 The RPC, having approved a licensee's complaint procedures on initial application to become a licensee, will only be involved if, after an appeal, a Subject of a complaint claims that the licensee concerned did not correctly follow its own procedures. If the RPC upholds that claim, it will refer the matter to the licensee for a re-hearing.

Sanctions of Registrants by Licensees

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It is for the licensee to determine whether any sanction(s) against a registrant is appropriate. The severity of such sanctions would be determined by the nature of the breach of their code of professional conduct.

The RPC would expect licensees to maintain a list of possible sanctions that may be applied against registrants. The RPC shall review, on initial application and at re-assessment every quinquennium, that list of sanctions and would expect it to include:

1. A written warning with advice but no further action.
2. A requirement to improve specified aspects of the registrant’s performance.

The specified improvement actions would need to be completed, to the satisfaction of the licensee, within a stated time-scale.

3. Suspension of the registration, which would normally be imposed if:
 - a. **either**, the specified improvement actions, in 2 above, were not satisfactorily completed within the stated time-scale;
 - b. **or**, the licensee deemed that the initial breach had been sufficiently serious to warrant immediate suspension. In this case specified improvement actions would be imposed on the holder in order to avoid eventual withdrawal of the registration.

In the event of suspension of registration, the registrant would normally be given a mutually acceptable final deadline by which time relevant improvement actions must be completed, to the satisfaction of the licensee.

4. Withdrawal of registration which would normally be imposed if:
 - a. **either**, the holder failed to meet the mutually acceptable final deadline specified in 3 above. Such circumstances would result in immediate withdrawal of the registration with no right of appeal, other than on the grounds of extreme extenuating circumstances, such as of a medical nature;
 - b. **or**, the licensee deemed that the initial breach had been sufficiently serious to warrant immediate withdrawal.

5. In the event of withdrawal of registration, the registrant would be allowed one month’s grace within which to appeal against the intended withdrawal. In the event of an appeal, the registration would remain valid until the outcome of the appeal was determined.

In the event of registration being withdrawn, the former registrant will be informed by the licensee of the time that must elapse before a further application for registration can be made. Any such

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further application would have to be as for an initial application (ie. involving a full portfolio of evidence).

Licensing

1. Professional institutions that are concerned with the practice of radiation protection may apply to the RPC to become licensees of the RPC. The first such licensee is the SRP. As the only Chartered corporation within the radiological profession, the SRP is the only possible owner of the Registers of Chartered, Incorporated and Technical Practitioners in Radiation Protection even though it is itself also a learned society for members. Consequently, and to avoid any conflict of interest, the SRP authorises the RPC to manage the Registers at arm’s length.

2. The SRP has two roles as identified in the Introduction above – one is as the owner of the Registers, and the other is as a licensee. It avoids a consequent possible conflict of interest by the delegation of the management of the Registers to the RPC whose membership comprises representatives of licensees and of other independent and interested parties. Although the RPC reports to the SRP Council through circulation of its minutes – given that SRP has the legal responsibility for all matters concerned with the operation of the Register – SRP does not intervene in matters of policy or operation of the Register.

3. Such other organisations that apply to become licensees of the RPC shall initially satisfy such criteria as the RPC shall require. Licences shall be renewable after re-assessment every five years. In each intervening year, the licensee shall provide the RPC with an annual report on its activity in respect of its section of the Registers.

4. Should an applicant organisation fail to satisfy the RPC on initial application, or at a subsequent quinquennial review (which may be advanced to deal swiftly with any complaint against a licensee), the RPC may grant the initial or continuing licence with any conditions – one of which may be the appointment of a mentor society (which itself operates satisfactorily an RPC licence) to assist the failed applicant until such time as the RPC considers it to be able to operate on its own.

5. In the event of a licensee failing to satisfy the review requirements of the RPC at any time and so wishing to appeal the RPC decision, the RPC shall appoint an *ad hoc* panel

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of senior but un-conflicted radiation protection practitioners to hear such an appeal. The decision of that Panel shall be final.

6. If the circumstances of 5 above occurred so that a licence was suspended, the RPC could appoint another licensee (or, in default, an appropriate nominee of RPC) to continue to supervise the registrants on the respective register, in accordance with their code of conduct.

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