

A STATEMENT FROM THE CHIROPRACTIC PROFESSIONAL ASSOCIATIONS AND RCC REGARDING PLANNED INSPECTIONS OF CHIROPRACTORS WITH X-RAY FACILITIES



The Health and Safety Executive will be undertaking a series of inspections for all chiropractors with X-Ray facilities in the next 6 weeks. These inspections are to take place in England, Scotland and Wales only and are to be completed by the end of this tax year, April 2019.

On 1st January 2018, Ionising Radiation Regulations 2017 (IRR17) came into force and replaced Regulations IRR99. The main changes from IRR99 are:

- How you tell the [Health and Safety Executive](#) that you work with ionising radiation
- The dose limit for exposure to the lens of the eye - reduced from 150mSv to 20mSv in a year

This set of regulations is targeted at ensuring the safety of staff and members of the public which is separate to the regulations concerned with the safety of patients (IR(ME)R17).

In order to ensure compliance with these regulations, the Health and Safety Executive (HSE) have begun a rolling program of inspections. We have been informed that the chiropractic profession is to be inspected in this regard as part of a planned series of inspections which began with the Veterinary profession. This is not in response to any incident or designed to target our profession for any reason. All professions subject to the new regulations may be inspected to ensure that procedures are safe and compliant. It is important to note that all practices with X-Ray facilities are always subject to inspection.

The BCA, MCA, SCA and UCA together with the RCC and GCC met with the HSE Specialist Inspector of Health and Safety, Karen Fuller, who was keen to engage with the profession to ensure compliance and explain the process to our members. At this meeting we agreed we would work collaboratively together to inform and support our members/registrants on this important issue of HSE inspections. That's why you are receiving this single information sheet which we hope is helpful to you.

WHAT DO I NEED TO DO?

The deadline to notify the HSE was February 6th 2018, when you would have applied to 'register' your work with ionising radiation. We have been informed that in addition this to some chiropractic clinics have mistakenly received 'consent' for administering radioactive substances. In these cases, the chiropractor is advised to remove that element of their registration.

The HSE have produced the following guide on what to expect when an Inspector calls www.hse.gov.uk/pubns/hsc14.pdf. We ask that all chiropractors with X-Ray facilities familiarise themselves with this document.

The HSE explained that all Inspectors carry warrant cards which means that they have the remit to perform an inspection without any prior notice to you. We have been assured that all Inspectors will aim to give notice of their planned visit, and that they may request some paperwork in advance to facilitate the inspection (i.e. Risk assessment and local rules). The Inspector will wish to meet with the practice RPS and will ask for the details of your RPA. Some practices may wish for their RPA to be present for the inspection, but this is not a requirement. Local rules must be 'suitable and sufficient'. One registration may be in place across any 'chains' of practices but individual local rules will need to apply as individual differences in practice must be accommodated for.

WHAT SHOULD I HAVE IN PLACE?

Evidence of radiation safety training for your RPS and operators

Training for your RPS has been a requirement since 1999. Courses are available through your Professional Associations and the RCC

A risk assessment of your facilities which will identify further staff who will need training

Under the [Management of Health and Safety at Work Regulations](#) (MHSWR), all employers must undertake a risk assessment, and this should consider the risks from radiation in the workplace. Under IRR17 employers must undertake a radiation risk assessment before they start any new activity with ionising radiation, giving particular consideration to exposure levels and accident situations. An example given by the HSE was that of the cleaning staff who may come into contact with the facility.

You should ensure that you have documented the training of all relevant individuals with reference to the syllabus of training. This may be necessary for non-clinical staff dependant on your risk assessment and individual practice circumstances.

Be able to provide evidence that you have taken steps to ensure all members of staff are safe; this may include a policy on when not to enter the room, such as when the light is on.

Evidence of the maintenance of your equipment

The frequency and nature of maintenance should be determined through risk assessment

Ensure that Radiation Controlled areas have clear signage and effective shielding

Restriction of exposure

This is separate to maintaining the quality of exposure, which falls under (IR(ME)R17). Restriction of exposure should be achieved first by means of engineering control and design features. Where this is not reasonably practicable employers should introduce safe systems of work and only rely on the provision of personal protective equipment as a last resort.

WHAT HAPPENS DURING THE VISIT?

This document outlines what happens when a health and safety inspector calls www.hse.gov.uk/pubns/hsc14.pdf
We advise members to keep minutes of their Inspection, noting the comments given by the Inspector.

WHAT WILL HAPPEN NEXT?

Once this series of inspections has been completed the HSE will report back to the professional associations identifying any common themes which we can look to address as a profession

If you have any further questions surrounding this, please contact your Professional Association who can provide you with further support or signposting.