



Radiological Protection Institute of Ireland

An Institiúid Éireannach um Chosaint Raideolaíoch

Inspection philosophy & unannounced inspections

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Purpose of Inspections

- Assess compliance with legislation and licence conditions
- Assess how radiation protection is implemented in practice
- Assess organisational culture and commitment to radiation protection
- Promote good practice
- Provide an opportunity for licensees to raise issues



What are we trying to achieve?

- Form an impression of radiation protection on the ground
- Raise standards/encourage improvements
- Bring examples of good practice observed
- Build face to face relations
- Remind licensees, especially senior management, of their responsibilities
- Remind licensees of RPII's statutory role and powers (licensing, inspection, guidance and enforcement)



RPII 2010 inspection programme

- 223 inspections completed
- 8 unannounced
 - Dentist (3)
 - Vet
 - NDT
 - Chiropractor (enforcement visit)
 - Blood irradiator
 - Small hospital
- Comments from stakeholders



Advantages

- Licensee isn't prepared
- Validation of follow-up to a previous inspection
- Licensee can't create records just before the inspection
- Mixes it up a bit



Disadvantages

- May not be possible to get full attention of hospital staff
- Licensees may feel that the RPII is being confrontational
- Suggests RPII is out to find faults
- Suggests RPII doesn't trust the licensee
- Does not lend itself to the two-way approach
- Nothing wildly different to see from one inspection to another
- Dental sector – equitable?



When would you do them?

- Verification that items from previous inspections have been addressed
- Concern or complaint received from a member of the public or licensee staff
- Licensee is refusing to meet their regulatory obligations (enforcement)
- Inspector is in the area with time on his/her hands
- Concerns over the follow up to a contentious issue



When wouldn't you do them?

- Information required can only come from a specific individual
- Where the inspection could adversely affect patient treatment
- Where it will have an immediate negative impact on a service being provided or will adversely affect someone's work/income
- There may be occasions when the licensee is unable to see the inspector e.g. a dentist involved in a long operation/treatment with a patient, or is tied up with other appointments



What isn't possible

- Observing clinical procedures
- Meeting key personnel or the right people
- Seeing all the records that we would like
- Access to all areas – patient related issues, keys not available



Do they add value in the medical context?

- Not clear what you would look at that you couldn't review during a planned inspection. If a hospital is doing something wrong it's not because that they believe that it's wrong - this would still be obvious during a planned inspection
- Not convinced of the benefits they provide. However, there will be occasions where they have a role to play and could lead to improvements.



What do other regulatory bodies do?

- Irish Medicines Board
- Health Information Quality Authority
- ERPAN



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Irish Regulatory Bodies

- **Principle of proportionality:** If the regulatory body doesn't suspect anything is wrong, the balance between the disruptions caused by an unannounced inspection must be weighed up against adversely affecting patient treatment from the public's point of view
- Announced inspections are primarily used as a tool for monitoring compliance
- Unannounced inspections says that the regulator cares less about the relationship it has with the hospital and more about what it will find. This can be counterproductive to maintaining compliance relationships.
- Announced inspection - generally get the best from the hospital, build on the goodwill between the hospital and regulatory body and reduce delays by ensuring that records are available on the day
- Suspicion that something is seriously wrong → unannounced inspection in order that people couldn't hide or destroy vital records



ERPAN Survey

Email (14th January 2011)

- Do you carry out unannounced inspections in hospitals?
- If so, what percentage of your hospital inspections are unannounced?
- How do they improve radiation protection e.g. what would you see that you wouldn't see in a planned inspection.



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ERPAN Responses

- Responses from UK, Slovenia, Switzerland, Luxemburg and Belgium
- Most inspections are announced
 - Unannounced inspections are inefficient for inspectors, disruptive to staff & patients
- Announced inspections provide an extra “incentive” to licensees
- Unannounced aspect of an announced inspection

