



Policy name: Assessment and Control of Radon in HMPPS Prisons, Probation Sites and Contracted Prisons Policy Framework.

Re-Issue Date: 8th January 2026

Implementation Date: 17 April 2023.

Replaces the following documents (e.g. PSIs, PSOs, Custodial Service Specs) which are hereby cancelled: PSI 19/2015 NOMS Health and Safety Arrangements - Assessment and Control of Radon Exposure in NOMS' Custodial Premises

Action required by:

x	HMPPS HQ	x	Governors/RPDs	
x	Public Sector Prisons	x	Heads of Group	
x	Contracted Prisons	x	The Probation Service	
x	Under 18 Young Offender Institutions		Other providers of Probation and Community Services	
	HMPPS Rehabilitation Contract Services Team			

Mandatory Actions: All groups referenced above must adhere to the Requirements section of this Policy Framework, which contains all mandatory actions.

For Information:

The aim of this Policy Framework is to produce clear guidance for HMPPS sites on managing Radon across all prison, under 18 Young Offender Institutions (YOIs) and probation sites in England and Wales.

By the implementation date Governors¹ of public sector prisons and under 18 YOIs, Directors of contracted prisons and Regional Probation Directors² (RPD) of probation sites must ensure that any local guidance and procedures that they develop because of this Policy Framework are compliant with relevant legislation, including the public sector equality duty (Equality Act, 2010).

In this document any reference to 'Prison Group Director' (PGD) means the Deputy Director of contracted custodial services in the case of any contract managed prison. Any reference to (RPD) means Probation Director for Community Accommodation Services (CAS) in the case of Approved Premises.

The HMPPS Radon Assessment and Control of Radon Manual provides guidance to implement the mandatory requirements set out in section [4] of this Policy Framework. Whilst it will not be mandatory to follow what is otherwise set out in this guidance, clear reasons to depart from the guidance should be documented locally. Any questions concerning departure from the guidance can be sent to the contact details below.

¹ In this document the term Governor also applies to Directors of Contracted Prisons

² In this document the term Regional Probation Director also applies to Probation Director for Community Accommodation Services

How will this Policy Framework be audited or monitored:

Mandatory elements of this Policy Framework will be subject to audit and monitoring via;

- Ministry of Justice Property Services (MoJ PS) audit of statutory, legal and mandatory compliance using Property Compliance Audits (PAT's)
- The National Health Safety and Fire Governance Strategy (HSFGS) defines the national, regional and local audit and assurance processes. A copy can be requested via the contact details below.
- Local management checks, which may be subject to audit by operational line management, as judged to be appropriate by the managers with responsibility for delivery. (Refer to Section 10 of the manual).
- MoJ PS must provide assurance to HMPPS at executive, group and site level via reports presented at Estates Tripartite Meetings.
- Health, safety and fire leads (HSFL) must monitor policy compliance and management arrangements and report to duty holders.
- PGDs/RPDs and Governors will monitor compliance with requirements set out within this Policy Framework at their sites.
- In contracted custodial settings, policy monitoring, audit and assurance will be via standard custodial contract management arrangements.

Resource Impact:

No permanent staffing issues arise. An ad-hoc Radiation Protection Supervisor (RPS) may be required where local rules are implemented as a temporary control measure on Radiation Protection Advisor (RPA) advice. This will be managed by the health and safety lead within prisons. Within probation sites a volunteer will be identified to carry out the role where health and safety leads are remote. Many of the technical and procedural measures for control are likely to be in place and/or accommodated in existing budgets or programmes. The transition to standardising requirements across all HMPPS sites, may mean that some locations may revisit their assessments and improve their compliance leading to some local demands, but it is likely that these will be accommodated in existing programmes or put through capital or local bid prioritisation processes.

Contact:Health-Safety.national@justice.gov.uk

Deputy/Group Director sign-off: Cohen Lewis, Deputy Director

Approved by OPS for publication: Helen Judge, Area Executive Director North East, Yorkshire & the Humber, Chair of Operational Policy Sub-board.

Revisions

17 August 2023	<p>Minor changes to provide further clarity on: FM RPA and site responsibility for completing the Radon Risk assessment where above and below action levels are present; and HMPPS responsibility to inform above action level exposure of third party employees to their employer. Amendments are to para 4.22 of the PF; para 5.3 of the Manual Annex A and Annex 1.</p>
8 th January 2026	<p>Changes have been made to the policy to provide further clarity and detail related to;</p> <ul style="list-style-type: none"> • Roles and Responsibilities within Annex A and inclusion of a separate Probation specific Roles and Responsibilities (Annex C) to provide further detailed requirements for management of radon; • Radon monitoring strategies; • Requirement for a site specific radon register; • Construction and maintenance projects; • Radiation and radon risk assessment process; • Requirement for passive monitoring post installation of permanent mitigation being put in place; • Radon action levels associated to IRR17 and UKHSA guidance; • Increased frequency of indicative survey and where a geological survey may be required; • Consultation with third party employers; • Inclusion of health surveillance; • Radon Investigation; • New and expectant mothers; • Ill Health and OH referral procedures; • Requirements for training; • Procedures surrounding planned maintenance of radon mitigation measures • Updated Formal Acceptance of Radiation Risk Assessment (Annex B); <p>Provision of additional annexes;</p> <ul style="list-style-type: none"> • Radon Investigation (Annex D); • RPS Appointment (Annex E); <p>Changes to the manual include the inclusion of a National Monitoring Strategy and detailed hierarchies of control where elevated levels of radon are identified. In addition, further clarity and detail related to;</p> <ul style="list-style-type: none"> • Definition of a subterranean room and undercroft; • Dose limits and reporting line to HSE where dose limit/action level is breached; • Ill Health and OH referral procedures, including symptoms, process for a referral and signposting support available; • Information and training to be shared with staff and others; • Implementation Summary record (Annex 2) • Radon Awareness Training PowerPoint presentation (Annex 3) <p>Provision of additional annexes;</p>

- Template notice to prisoners for monitoring in cell (Annex 4)

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1. Purpose

1.1 The Health and Safety at Work Act 1974, the Management and Safety at Work Regulations 1999 and the Ionising Radiations Regulations 2017 (IRR17) set the legal framework on which this policy is based. As an employer and controller of premises, HMPPS must ensure that an assessment of the exposure to radon gas is made and controls, where necessary, are put in place, to ensure it minimises the risk of adverse health affects to those in its premises. This policy lays out the minimum requirements for the control of exposure to radon in all HMPPS sites and contracted prisons. It identifies the action necessary to evaluate and measure radon exposure and subsequently assess, control and monitor the risk to staff, prisoners (including children (under 18) in YOI's), people on probation and third parties.

It is important to note that prisoners and children (under 18) in custodial accommodation and people on probation residing in approved premises may potentially be exposed for long periods equivalent to domestic exposure. Therefore in relation to prisoners it is also best practice to follow the United Kingdom Health Security Agency (UKHSA) guidance on domestic exposure thresholds.

2. Evidence

2.1 Radon is a naturally occurring radioactive gas and the UK's single largest contributor to radiation background exposure levels. Radon is harmful by inhalation and may cause damage to lung tissue, contributing to lung disease including lung cancer. The risk of harm from radon is influenced by the concentration of the gas and the duration of exposure. Adverse health effects are significantly worse in smokers.

3. Outcomes

3.1 Implementation of this policy framework, including control measures identified by the risk assessment approach it outlines, should;

- Prevent exposure to ionising radiation wherever possible to employees of HMPPS, prisoners, visitors, or any other relevant person attending premises controlled by HMPPS.
- Where exposure cannot be prevented, reduce exposure to ionising radiation so far as is reasonably practicable and subsequently reduce risks to health from radon exposure to prisoners, employees, visitors (potentially including children or young persons aged under 18 or other vulnerable persons such as pregnant or new mothers), persons on probation, or other relevant third party individuals such as external contractors. HMPPS is committed to ensuring compliance with relevant legislative and common law duty of care requirements, and to reducing Radon exposure to the lowest reasonably practicable level and below specified legal threshold levels defined within IRR17 the United Kingdom Health Security Agency (UKHSA) guidance.
- HMPPS is aware of its obligation to take particular steps to restrict the exposure of any employees who would not normally be exposed to ionising radiation in the course of their work as far as is reasonably practicable. The dose control measures should make it unlikely that such people would receive an effective dose greater than 1 mSv per year.
- This policy framework has been produced with reference to relevant guidance, including L121 Work with Ionising Radiation Approved Code of Practice & Guidance.

4. Requirements

- 4.1 All senior managers with overall responsibility for an establishment, approved premises or other HMPPS site must be aware of the need to provide oversight of these arrangements and of the scope and intention of the policy, and the need to put it into effect and monitor its implementation.
- 4.2 HMPPS staff with responsibility for health and safety e.g. Governors, RPD, Sponsors, Senior Health and Safety Fire Advisor's (SHSFA), Principle Health, Safety Fire Lead's (PHSFL), Regional Health Safety Leads (RHSFL) and National Health, Safety and Fire Leads (HSFL), MoJ PS staff with responsibility for delivery of services to the HMPPS estate, MoJ contractors including Facility Management (FM) providers and HMPPS staff with responsibility for accommodation must be familiar with its detail.
- 4.3 Those staff with responsibility for health within contracted prisons e.g., Directors, Controllers, Health Safety Advisor's, HMPPS Custodial Contracts Directorate and staff with responsibility for accommodation must be familiar with its detail.
- 4.4 Local health and safety committees, union health and safety officials and other relevant staff representatives must be made aware of this policy and consulted on its implementation and monitoring locally.
- 4.5 All staff have a statutory right to be informed of the risks to which their work exposes them and the methods HMPPS or contracted prisons uses to control these risks. All staff are legally required to co-operate with their employers on matters of health and safety.
- 4.6 It is the responsibility of MoJ PS and FM Contractors to collaborate and provide HMPPS Chief Operations Officer, Deputy Directors, Executive Directors, PGD's, RPD's and Governors with the information needed to ensure that:
 - A suitable and sufficient radon survey and assessment is in place and its controls are being monitored in line with this guidance or:
 - Existing surveys and assessments are reviewed and revised in the light of this policy and appropriate action plans are developed and implemented, where required.
- 4.7 It is the responsibility of the FM Provider and separately HMPPS working with MoJ to ensure suitable qualified RPAs are appointed inline with current legislation and any guidance provided by HSE.
- 4.8 In HMPPS sites Governors/RPDs must ensure that the following arrangements are in place:
 - MoJ PS staff with responsibility for the site must work with the local and Regional SHSFA's and PHSFL (Prisons) Regional and National HSFL's (Probation), MoJ appointed FM provider and the FM provider's appointed RPA to ensure effective radon surveying and risk assessment is in place.
 - Prison and Regional Probation Estates Tripartite Meetings must include radon management actions and mitigations where appropriate.
 - Implementation of engineering controls will be agreed by MoJ PS using the appropriate funding mechanism based upon financial thresholds and project size.

- Ensuring implementation, ongoing maintenance, test and inspection of engineering controls will be via MoJ PS with responsibility for the site through planned preventative maintenance programme recorded on computer aided facilities management system (CAFM) with assurance given to the Governor/RPD and local SHSFA (prison)/RHSFL (probation).
- Ensuring implementation and ongoing oversight of local management arrangements as defined in the risk assessment will be via the Governor/RPD and relevant functional managers.
- A Radiation risk assessment (where required as per 4.31) for the site must be made available by the FM provider to the local prison or Probation Delivery Unit (PDU)/Approved Premises (AP) Functional Health and Safety committee on an annual basis following review (or earlier where there is a change).
- Changes to local controls or conditions and monitoring reports must be communicated to the Governor/RPD and local SHSFA (Prison)/RHSFL (Probation) and made available to the relevant Health and Safety committee.

4.9 Within contracted prisons our advice is to follow steps 4.6 - 4.8 however given the contractual differences within the contracted estate there may be some variation. In any circumstances, actions must be compliant with legislation.

4.10 The Building Regulations include requirements for design consideration in terms of radon management. Newer HMPPS premises should therefore have intrinsic control from design stage where radon is a risk, but these must be tested and maintained. Local risk assessments will reflect these differences.

4.11 All project work, planning permission etc, must include radon design considerations where appropriate. Further information is provided in Section 6 of the HMPPS Radon Management and Monitoring Strategy Manual and within Annex A (Prisons / under eighteen YO's) and Annex C (Probation)

4.12 **Operational Procedures**

The HMPPS Radon Gas Management - Outcomes and Responsibilities documents Annex A (Prisons/ under eighteen YO's) and Annex C (Probation) and the HMPPS Radon Management and Monitoring Strategy Manual should be read in conjunction with the below. Contracted prisons must put in place appropriate, and at least equivalent measures to meet policy requirements and legislative compliance.

4.13 **Register of Subterranean Rooms and Undercrofts**

Whether in a Radon Affected Area (RAA) or not, a register of all subterranean work rooms and living accommodation including undercrofts identified on site must be maintained by the FM provider. It must;

- Include an evaluation of the duration of occupancy for each area.
- Identify responsibility owners.
- Be reviewed when a change of use and/or a refurbishment occurs or at least annually.

4.14 Within probation premises, the register of subterranean rooms and undercrofts must be held by the FM contractor electronically in a central depository accessible to MoJ PS and in the Assessment and Control of Radon in HMPPS Prisons, Probation Sites and Contracted Prisons.

site logbook. This must be reviewed by the FM contractor with the responsible person for the building when a change of use occurs or at least annually.

The responsible person for the building must;

- Include an evaluation of the duration of occupancy for each area
- Identify responsibility owners

4.15 Radon Survey

- MoJ PS must complete an indicative survey for **all** HMPPS sites using the UK Radon website to assess if a radon survey is required. Surveys must be repeated annually.
- Where the indicative survey identifies the site is in a Radon Affected Area (RAA) (1 km sq.), a more detailed site-specific geological survey must be undertaken to inform decision making and establish whether action is required.

Where an annual indicative survey and a geological survey has been completed previously and there is no change in the annual indicative survey findings, a new geological survey is not required.

4.16 Radon Monitoring Strategies

4.17 National Radon Monitoring Strategy

A National Radon Strategy is provided within the HMPPS Radon Management and Strategy Manual (Section 5) which will apply to each FM Providers geographical region of responsibility will;

- Provide an overarching plan for initial monitoring which considers a broad spectrum of monitoring locations within each site.
- Explain how further monitoring will be expanded where the initial monitoring survey gives readings which are found to be above action levels (300Bq/m³)
- Explain how further monitoring will be expanded where the initial monitoring survey gives readings which are found to exceed 200Bq/m³, however remain below 300 Bq/m³ in sleeping accommodation
- Explain how radon levels in any area/room are found to exceed levels (300Bq/m³) must be managed.
- Explain how radon levels in sleeping accommodation found to be above 200Bq/m³, however remain below 300 Bq/m³ must be managed.

4.18 Site Specific Radon Monitoring Strategy

Where actionable levels have been found, the National Radon Monitoring Strategy (as referred to above in 4.17) must be used to develop a site specific Radon Monitoring Strategy at each affected site. This must take account of occupancy and use of buildings. The site specific Radon Monitoring Strategy must be written by the FM Provider Radon Specialist Contractor or FM RPA within the FM Providers region of responsibility.

This strategy requires annual review or earlier where there is a significant change.

4.19 Survey Monitoring and Report

- Site in a **non** RAA;

Where below-surface work rooms are present and occupied more than an average of an hour per week or approximately 50 hours per year; or basements contain an open water source (i.e. undercroft, pit, well); or if there is occupied subterranean living accommodation in officially **non** RAAs, monitoring of radon levels under the advice of FM RPA must be carried out to quantify the risk of radon exposure. Where it is not possible to determine exposure time, monitoring must be undertaken.

- Site **within** a RAA

Where a site or any part of it lies within a RAA, sample monitoring must be carried by a Radon Specialist Contractor and report provided to inform a subsequent risk assessment.

Monitoring must include occupied below-ground workplaces (those occupied greater than an average of an hour per week or approximately 50 hours per year) and those containing an open water source (i.e. undercrofts). The sample monitoring locations for non-subterranean rooms will be determined in consultation with the Radon Specialist Contractor.

4.20 Radon inspection and testing for radon levels is to be repeated at least every 10 years or more frequently on the advice of the FM RPA if required.

4.21 In all instances where monitoring is required, the National Radon Monitoring Strategy (4.17) must be used to provide the overarching plan from which the site specific monitoring strategy (4.18) is developed for each site where actionable levels are found.

4.22 Notification of Monitoring Reports and Above Action Levels by FM Providers

The outcomes of all monitoring survey report's must be communicated by the FM provider without delay to key stakeholders. Refer to Annex A (Prisons) and Annex C (Probation).

4.23 Site Specific Radon Register

A separate site radon register of all rooms subjected to passive monitoring must be kept and maintained by the FM Provider. All results of passive monitoring (both above and below action levels) must be updated into the register, include any current mitigation which is in place and be kept for audit purposes. Refer to Annex A (Prisons) and Annex C (Probation).

4.24 Notification to the Health and Safety Executive of Above Action Levels

Where it is identified readings are in excess of 300 Bq/m³, the local HMPPS HSFA (or MoJ PS in the case of probation sites) must notify above action levels to the HMPPS Headquarters Health of and Safety (HS) Strategic Centre, who will at the earliest opportunity notify;

- The Health and Safety Executive (HSE)
- The HMPPS RPA
- HMPPS Health & Care Partnerships Team, to jointly agree the appropriate level of escalation to UKHSA or Regional Health Protection Teams.

Appropriate written management arrangements within contracted prisons must be put in place to ensure notification to the HSE and escalation to the UKHSA where appropriate.

4.25 **Dose Exposure Calculation**

An exposure assessment must be carried out by the HMPPS RPA and shared with affected individuals via the HS Strategic Centre where;

- Individuals on site are exposed to radon in excess of the 300 Bq/m³

4.26 **Notification to the Health and Safety Executive of Individual Exceeding IRR17 Dose Limits**

HMPPS Health and Safety (HS) Strategic Centre will notify the HSE as soon as practicable, where an exposure assessment carried out by the HMPPS RPA identifies individual dose exposure for;

- **An employee is above** the legal dose limit threshold levels defined within IRR17 (20 mSv).
- **An expectant mother** (for the term of pregnancy following the employee notifying their line manager of the pregnancy) **is above** the dose limit threshold levels defined within IRR17 (1mSv).
- **A prisoner/ people on probation is above** the legal dose limit threshold levels defined within IRR17 for the general public (1 mSv).

4.27 **Planning and Mitigation Controls (all areas)**

Where readings from the monitoring survey report are above statutory action levels set within the IRR17, following a three month monitoring programme the following actions shall be instigated;

- Temporary mitigations and suitable controls must be put in place on the advice of the FM RPA.
- Where the FM appointed RPA's radiation risk assessment identifies a need for local rules, the FM appointed RPA must provide the local rules for implementation by site.
- RPS training to be provided to identified person/s by the HMPPS RPA where local rules are required by the radiation risk assessment. The RPS must then be appointed by the prison Governor/ approved premises Head of PDU/ contact centre Head of Public Protection (HOPP) responsible for the site to monitor compliance with the local rules where in place (Annex E)
- The FM RPA must liaise either directly or indirectly via the HMPPS HS (Strategic Centre) with the HMPPS RPA to keep them informed of site related radon issues, radon levels, the proposed mitigations and the ongoing monitoring.
- A mitigation survey commissioned, which must be carried out by a Radon Specialist Contractor and include formal recommendations for any remedial works to reduce radon levels as far as reasonably practicable.

- Mitigation controls to be agreed by MoJ PS using the appropriate funding mechanism based upon financial thresholds and project size.
- The HMPPS Radon Management and Monitoring Strategy Manual, **Hierarchy of Control** (Section 5) provides further information on how radon must be managed.
- A site specific Radon Monitoring Strategy (refer to 4.18) must be developed and advice obtained from the FM RPA to inform consideration to any further radon monitoring which may be required across the site.

4.28 **However**, where readings from the monitoring survey report are found to be above 200 Bq/m³ but below 300 Bq/m³ within **Sleeping accommodation** following a three month monitoring programme it is necessary for;

- A mitigation survey to be commissioned, which must be carried out by a Radon Specialist Contractor and include formal recommendations for any remedial works to reduce radon levels as far as reasonably practicable.
- Mitigation controls to be agreed by MoJ PS using the appropriate funding mechanism based upon financial thresholds and project size.
- The HMPPS Radon Management and Monitoring Strategy Manual, **Hierarchy of Control** (Section 5) explains in more detail how radon must be managed.
- A site specific Radon Monitoring Strategy (refer to 4.18) must be developed and advice obtained from the FM RPA to inform consideration to any further radon monitoring which may be required across the site.

Where readings exceed 300 Bq/m³ it is important to follow the process as described in 4.27

4.29 In all instances, the outcomes of the mitigation survey must be shared by the FM provider at the earliest opportunity with;

- MoJ PS with responsibility for the site, local SHSFA (prison) and Regional HSFL (Probation), HS Strategic Centre, HMPPS Estates IPF and the Governor/RPD.

4.30 In all instances, mitigation controls must be considered, selected and implemented subject to the advice of FM RPA and Radon Specialist Contractor. Permanent mitigations must be subject to a three month passive radon monitoring programme following installation to ensure the permanent mitigation has been effective.

4.31 **Radon Risk Assessment**

A **local** radon risk assessment must be carried out and completed within the prison estate by the SHSFA/local management supported by the Regional HSFL within the probation estate where;

- Below ground workplaces are present.
- Workplaces are located in radon affected areas.
- Site has undertaken monitoring, and no further action is required under the advice of the FM RPA.
- Permanent mitigation/s have been put in place, which have been proved effective through post mitigation monitoring and a formal communication has been provided by

the FM RPA to confirm the IRR17 requirement for a Radiation risk assessment is no longer necessary.

The radon risk assessment for the site must be;

- Submitted by the SHSFA/ Regional HSFLs to the HS Strategic Centre FMB: Health-Safety.national@justice.gov.uk.
- Shared with the local HSF Committee (Prison) /Regional HS committee (Probation) at least annually or more frequently where there is a change in the assessment.

4.32 Radiation Risk Assessment

Where above action levels of radon set within IRR17 are identified, **a radiation risk assessment must be in place for the affected area/s** and outline the controls and restrictions to limit exposure to those requiring entry to the area.

The radiation risk assessment must be completed by the FM RPA for the site and be;

- Formally accepted and agreed by the Governor/Head of PDU/HOPP, FM site manager (Prison) and MoJ PS staff responsible for site using Radon Acceptance letter (Annex B) and retained locally for audit.
- A copy of the signed Acceptance letter and radiation risk assessment must be submitted by the SHSFA/ Regional HSFLs to the HS Strategic Centre FMB Health-Safety.national@justice.gov.uk
- Provided to the FM provider in respect of probation sites by the Regional HSFL.
- Shared with the local HS committee (Prison) /Regional Probation HS committee annually or more frequently where there is a change in the assessment.

4.33 Once mitigations are in place and it is confirmed effective following post mitigation monitoring, a formal communication must be provided by the FM Provider RPA where the IRR17 requirement for a radiation risk assessment is no longer required.

The formal communication must include;

- Type of mitigation and date of implementation.
- Results of 90 day post mitigation monitoring to prove efficacy.
- Frequency of future mitigation monitoring.
- Frequency of future business as usual sample monitoring across site.
- The actions that would be required in the event that the engineered radon mitigation measures failed

The communication must be;

- Formally accepted and agreed by the Governor/Head of PDU/HOPP, FM site manager (Prison) and MoJ PS staff responsible for site using the Radon Acceptance letter (Annex B) and retained locally for audit.
- Provided to the FM provider in respect of probation sites by the Regional HSFL.
- Submitted by the SHSFA/ Regional HSFLs to the HS Strategic Centre FMB: Health-Safety.national@justice.gov.uk

- Shared with the local HS committee (Prison) /Regional Probation HS committee.

4.34 **HMPPS Consultation and Co-operation with Third Party Provider Employers for their staff based on site**

The Governor/Head of PDU/HOPP must inform all non-directly employed third party contractor employers about any;

- Radon affected areas on site.
- Radon affected areas in which their staff may be required to work.

Formal agreement must be in place with the Radiation RA owner/duty holder that third party employees who are required to access any radon affected area are included in the Radiation RA. This will need to be formally assured at the earliest opportunity by the Governor/Head of PDU/HOPP.

Should any third party contractor employees be required to access any controlled or supervised area/s defined within the site radiation risk assessment then their employer will need to enact the requirements on employers set out within the IRR17 which will immediately come into force. This would include appointing their own RPA to advise on radiation matters and compliance.

4.35 **Radon Investigation**

Where it is identified as part of radon monitoring, readings are in excess of statutory action levels, or it is identified an individual over exposure (as set within IRR17) has occurred following a dose assessment by the HMPPS RPA;

- A formal investigation commissioned by Intelligent Partnership Function (IPF) on behalf of HMPPS must be undertaken within a three month period of the event being identified.

Refer to Annex D for detailed information.

4.36 **Health Surveillance – Classified Workers**

All possible control measures must be put in place to keep exposure to radon as low as reasonably practicable under the advice of the FM RPA in accordance with the risk assessment put in place by the FM RPA.

In the unlikely event any person is required to work in the affected area where mitigation does not sufficiently reduce exposure and may exceed a cumulative dose greater than 6 mSv per calendar year (IRR17 legislation dose limit for non classified workers) the following must be put in place on the advice of the FM Provider RPA and HMPPS RPA collectively;

- Radiation risk assessment for prolonged access to a radon affected area which would require classification of identified staff and must set out all necessary control measures;
- HSE approved Radiation Dosimetry Services with appropriate dose monitoring put in place;

- Identified classified workers passed fit for work with ionising radiation following a medical assessment before first being designated as a classified person via the HMPPS Occupational Health (OH) provider;
- Ongoing health surveillance via the HMPPS OH provider at least once every year;
- Delivery of the necessary training to identified staff who will be 'classified workers';
- Individual classified worker radiation passbook maintained;
- Records kept until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from the date of the last entry made in it.

A classified worker dose limit is 20 mSv per calendar year, however, should the dose exceed 15mSv a formal internal investigation must be completed. Refer to Annex D for detailed information.

4.37 **Exceptions - New or Expectant Mothers**

The Management of Health & Safety at Work Regulations 1999 requires the employer to assess risk in the workplace for new and expectant mothers, and the IRR17 sets out restrictions to exposure to radon gas in the workplace specifically to protect the unborn child and baby while breast feeding.

Employees who are new, or expectant mothers should inform their Line Manager at the earliest opportunity so that HMPPS can complete a suitable and sufficient risk assessment. Should a member of staff confirm they are pregnant and it is established they work in an affected site with above action levels identified, monitoring findings undertaken/ongoing in the individuals work area should be considered as part of the New and Expectant Mother risk assessment. Where necessary in liaison with the local HFS team /Regional HS Lead and under the advice of the HMPPS RPA control measures must be put in place to limit the effective dose to as low as reasonably practicable and should not exceed 1 mSv during the remainder of the pregnancy (IRR17, Regulation 9 (6a)).

On return to work (to an affected site with above action levels identified) should an employee confirm they are a nursing mother (breastfeeding), a return to work risk assessment must consider any potential risk of radon contamination on the employee's skin. However this is extremely unlikely given the low risk of 'adhered' radon (radon gas that has formed a temporary attachment to a solid surface) contamination.

Advice from the HMPPS RPA should be sought to support completion of the risk assessment.

4.38 **III Health – Occupational Health Referral**

Any occupational exposure to radiation is thought to be a risk to health, but only in the long-term. No health effects in the short-term have been observed.

Should staff experience ill health, it advised in the first instance to;

- Discuss symptoms with your General Practitioner (GP)
- Advise your Line Manager in line with current organisational practice who will consider if an OH Referral is required.

Refer to Section 8 of the Radon manual for further information.

4.39 **Planned Maintenance Regime**

A planned maintenance regime must be in place within the CAFM system with;

- Visual inspections of passive and active gas venting systems carried out in accordance with PPM task/s schedule frequencies.
- Any equipment to mitigate and control radon, inspected and maintained in accordance with PPM schedules applied in CAFM.
- Before carrying out works to Active Radon protection systems the FM Supplier RPA should approve risk assessment and method statement for task delivery and advise on any precautions or limitations of access needed for the protected area.
- Any re-assessment of radon levels requirements set out in the radon monitoring report, or the formal notification from the RPA where it is confirmed a Radiation Risk Assessment is no longer required (following mitigation being put in place and a return to business as usual) planned into the CAFM system.
- Records maintained and available as evidence, to reflect both visual inspection and associated equipment maintenance.

Refer to Section 10 of the Radon manual for further information related to local operational management checks.

4.40 Major Construction and Maintenance Projects

Where a project has been commissioned, consideration to the risk related to Radon must be undertaken.

The Professional Service Providers are required to conduct a risk assessment and make recommendations for any additional surveys and monitoring, as part of the feasibility stages. The risk assessment must take account of all known information about radon on the site, including previous monitoring surveys, Radon mitigations (where installed both passive and active), records held by MoJ PS and locally by FM Provider and UK Radon Map.

Upon project completion / handover any information relating to radon assessment, monitoring and mitigation activities must be provided to the MoJ PS team and FM provider with appropriate service schedules put in place as required for any associated mitigation equipment.

4.41 Communications & Training

Within the induction process, staff, prisoners, people on probation and third parties must be provided with information, instruction and training related to radon where a site is located in a radon affected area and/or there are subterranean rooms /accommodation.

4.42 Where sites are in a radon affected area or have reported high levels of Radon, MoJ PATS will provide support to APOM/RPOM/POM when required in radon management.

4.43 Where local rules are required as a temporary control measure under the FM Provider radiation risk assessment, identified HMPPS staff will be provided with relevant RPS training by the HMPPS RPA to carry out the role.

4.44 Should there be any instances where over exposure may have occurred, site must;

- Take advice from the HMPPS RPA to provide the necessary exposure assessment information for individuals affected.
- Liaise with the local/ regional HSF team to provide an initial communication to all staff advising of above action levels being identified and deliver the approved Radon Awareness training package to individuals directly affected which is contained in the Radon Manual (Annex 3).
- Provide information to those on site of any mitigations which may directly affect them.
- Communicate the potential risk of over exposure to third party employers where there has been risk identified to their employees.

4.45 On receipt of the HMPPS RPA exposure assessment, HS Strategic Centre must communicate;

- Individual exposure information to those who have been overexposed via the Governor/RPD.
- With third party employers where third party employee's have been over exposed.

4.46 **Record Retention**

The following records created are to be maintained by MoJ PS for a period of fifty years from the date of creation;

- Postcode surveys
- Registers of below ground workrooms and their occupancy levels
- Registers of below ground accommodation
- Radon Specialist Contractor survey reports detailing all relevant radon levels.
- Risk assessments and significant findings.
- Mitigation surveys
- Remedial actions taken to reduce risk.
- Any dose estimates relating to accidental exposure.

In the case of custodial contracts directorate appropriate arrangements to maintain records must be put in place.

5. Annexes

- Annex A – Prison and Under 18 YOI HMPPS Radon Gas Management - Roles and Responsibilities document.
- Annex B – Radon Acceptance letter.
- Annex C – Probation HMPPS Radon Gas Management - Roles and Responsibilities document.
- Annex D – Formal Radon Investigation.
- Annex E - Radiation Supervisor Appointment Letter.

Glossary

AED	Area Executive Director
AP	Approved Premises
APOM	Area Property Operations Manager
BAU	Business As Usual
BM	Business Manager
CAFM	Computer Aided Facilities Management system
CAS	Community Accommodation Services
CEMAR	Contract Event Management and Reporting (software)
FM	Facilities Management
GP	General Practitioner
HOPO	Head of Property Operations
HOPP	Head of Public Protection
HS	Health and Safety
HSE	Health and Safety Executive
HSF	Health Safety and Fire
HSFL	Health Safety Fire Lead
HSFGS	National Health Safety and Fire Governance Strategy
IPF	Intelligent Partnership Function
IRR17	Ionising Radiation Regulations 2017
MoJ PS	Ministry of Justice Property Services
OH	Occupational Health
PATS	(MOJ) Property Assurance Technical Team
PCA	Property Compliance Audits
PDU	Probation Delivery Unit
PGD	Prison Group Director
POM	Property Operations Manager
PHSFL	Principal Health, Safety and Fire Lead
PPM	Planned Preventative Maintenance
RA	Risk Assessment
RAA	Radon Affected Area
RHSFL	Regional Health and Safety Lead
RPA	Radiation Protection Advisor
RPD	Regional Probation Director
RPOM	Regional Property Operations Manager
RPS	Radiation Protection Supervisor
SAO	Senior Administration Officer
SHSFA	Senior Health Safety and Fire Advisor
SPG	Senior Practitioner Group
UKHSA	United Kingdom Health Security Agency
YOI	Youth Offender Institute