

PROCEDURE

V3 FEB. 2023

DATA MANAGEMENT RADIATION PROTECTION COURSES

PURPOSE

This procedure describes the way personal data are managed for accredited radiation protection courses organised by the Radiation Protection Unit (Dutch: 'Stralingsbeschermingseenheid') Randwyck, under accreditation number ANVS-PP-2022/0091279-48.

PERSONAL INFORMATION, DATA, OPSLAGLOCATIES EN BEWAARTERMIJNEN

Personal information and data kept in the context of accredited courses, organized by the Radiation Protection Unit Randwyck, more specifically the courses 'Radiation Protection Officer – Dispersible Radioactive Materials – level D' (Dutch: 'Toezichthoudend Medewerker Stralingsbescherming – Verspreidbare Radioactieve Stoffen – niveau D' or 'TMS-VRS D') and 'Radiation protection for Medical Specialists who use X-ray devices' (Dutch: 'Stralingsbescherming voor Medisch Specialisten die gebruik maken van Röntgenapparatuur', unofficially abbreviated to 'SMSR'), are listed in *Table 1*.

Table 1: Personal information and data kept in the context of accredited courses

Information	Storage period	Storage location
Personal information (name, initials, date of birth, place of birth)	50 years	Digitally
Contact information (e-mail address)	1 year	Digitally
Approved score lists	1 year	Digitally
Exams	1 year	Hard-copy
Signed diplomas and score lists	50 years	Digitally
Confirmation of receipt diploma	50 years	Digitally
Confirmation of agreement use of personal information for course related purposes	50 years	Digitally
Dosimetric data	At least 30 years ¹	Digitally
Practical course confirmations	50 years	Digitally
Exam reports	5 years	Digitally
Course material	5 years	Digitally

All the above data and information, both hard-copy and digital, are stored securely and can only be accessed by employees of the Radiation Protection Unit Randwyck. No data will be shared with third parties. The ICTS-UM department guarantees secure access to the network locations where digital data is stored.

The Radiation Protection Unit Randwyck maintains an up-to-date administration system in which all course dates are linked to their exam result and diploma. After expiry of the retention period, the data is destroyed (hard-copy) and/or deleted (digitally) under the responsibility of the radiation protection courses supervisor.

In accordance with the exam regulations, the written exam can be viewed within a period of 6 weeks after the announcement of the result under the supervision of the course coordinator.

¹ Besluit basisveiligheidsnormen stralingsbescherming (Bbs), Article 7.16.2

LEGAL CONTEXT

The *'Regeling basisveiligheidsnormen stralingsbescherming'* (Rbs) describes the following requirements with regard to data management:

Article 5.25: A course at an accredited institute has adequate procedures for the quality assurance of the examinations if:

- a. examination regulations have been established, which at least establishes:
 - 1°. the composition of the examination board in terms of the required expertise in radiation protection and didactics;
 - 2°. the involvement of an official of the Authority for Nuclear Safety and Radiation Protection (Dutch: 'Autoriteit Nucleaire Veiligheid en Stralingsbescherming' or ANVS), or of the Ministry of Health, Welfare and Sport (Dutch: 'Ministerie van Volksgezondheid, Welzijn en Sport (VWS)') if it concerns a medical course;
 - 3°. the duration and manner of examination;
 - 4°. the confidentiality of the examination assignments;
 - 5°. the assessment standards and the standards for passing, re-examining and rejecting;
 - 6°. provisions concerning a practical course;
 - 7°. an appeal procedure and a complaints procedure about the examination;
 - 8°. arrangements for the examination of candidates with dyslexia or a work-limiting disability;
- b. the training manager shall draw up an examination report at the end of each examination;
- c. the institution communicates the examination regulations to each candidate;
- d. the written examination work shall be kept for at least one year after the examination has ended and shall be made available for inspection at the student's request.

Article 5.26: A course at an accredited institute has adequate procedures for quality assurance of the diplomas if:

- a. the institution has established a model for the course certificate;
- b. the awarded diplomas are signed by the chairman of the examination commission and by the accredited institution;
- c. the institution has an up-to-date administration system in which students, approved score lists and awarded diplomas of the course are registered.

PERSONAL DATA AND COMMUNICATION

Personal information and data are stored (digitally) in one location, whereby the course data are linked to the personal data. There is no duplicate administration.

Within the framework of the law *'General Data Protection Regulation'* (GDPR; Dutch: *'Algemene Verordening Gegevensbescherming'* or AVG), no address or other personal data of students are stored. All communication is via e-mail. Diplomas can be collected physically at the Radiation Protection Unit Randwyck, where they will be signed for receipt, or can be sent by mail. After sending by mail, all address data will be deleted. An acknowledgement of receipt will be asked via e-mail.

RIGHT OF ACCESS

In accordance with *Article 15* of the AVG, every person has the right to request which personal data are stored, how they are processed and for what reason these data are processed. For the right to inspect the data, please contact the radiation protection courses supervisor.

LIST OF ABBREVIATIONS

Dutch		English	
ANVS	Autoriteit Nucleaire Veiligheid en Stralingsbescherming	-	Authority for Nuclear Safety and Radiation Protection
AVG	Algemene Verordening Gegevensbescherming	GDPR	General Data Protection Regulation
Bbs	Besluit basisveiligheidsnormen stralingsbescherming	-	-
Rbs	Regeling basisveiligheidsnormen stralingsbescherming	-	-
SMSR	stralingshygiëne voor medisch specialisten die gebruik maken van röntgenapparatuur	-	radiation safety for medical specialists who use X-ray devices
TMS-VRS D	toezichhoudend medewerker stralingsbescherming – verspreidbare radioactieve stoffen niveau D	-	radiation protection officer – dispersible radioactive materials level D
UM	Universiteit Maastricht	-	Maastricht University
VWS	Ministerie van Volksgezondheid, Welzijn en Sport	-	Ministry of Health, Welfare and Sport

REFERENCES

- Besluit basisveiligheidsnormen stralingsbescherming
<https://wetten.overheid.nl/BWBR0040179/2018-07-01>
- Regeling basisveiligheidsnormen stralingsbescherming:
<https://wetten.overheid.nl/BWBR0040509/2019-02-15>
- Algemene Verordening Gegevensbescherming:
<https://wetten.overheid.nl/BWBR0040940/2020-01-01>
- Procedure regarding the organization of examinations

Revision table	
Version 1 – October 2018	Initial version.
Version 2 – September 2020	New layout. Storage periods added.
Version 3 – February 2023	Changed e-mail address. Accreditation number added. Diplomas can be sent via mail.