

PROCEDURE

V4 JUNE 2026

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.

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 for Medical Specialists who use X-ray devices' (Dutch: 'Stralingsbescherming voor Medisch Specialisten die gebruik maken van Röntgenapparatuur' or 'SMSR'), 'Radiation Protection Officer – Dispersible Radioactive Materials – level D' (Dutch: 'Toezichthoudend Medewerker Stralingsbescherming – Verspreidbare Radioactieve Stoffen – niveau D' or 'TMS-VRS D') and 'Radiation Protection Officer – Measurement and Control Techniques (Dutch: 'Toezichthoudend Medewerker Stralingsbescherming – Meet- en Regeltoepassingen' or 'TMS-MR'), are listed in *Table 1*.

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

Information	Storage period	Storage location ¹
Personal information (first name, last name, date of birth, place of birth)	50 years	Digitally
Contact information (e-mail address)	10 years	Digitally
Exams	1 year	Hard-copy
Signed diplomas and score lists	50 years	Digitally
Confirmation of receipt of diploma	1 year	Digitally
Confirmation of agreement use of personal information for course related purposes	50 years	Digitally
Dosimetric data	At least 30 years ²	Digitally
Practical course confirmations	3 years	Digitally
Exam reports	5 years	Digitally
Course materials	5 years	Digitally

All the data and information mentioned above, 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 department ICTS-UM 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 person responsible for the radiation protection courses.

In accordance with the exam regulations, the written exam can be reviewed within 30 days after the announcement of the results under the supervision of the course coordinator.

¹ Data is stored in a secured location, only accessible to authorized personnel. The organization takes reasonable and proportional measures to keep digitally stored data accessible, readable and reproducible during the period of storage.

² 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 person responsible for radiation education 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 course participants, 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 personal data of students are stored other than the data mentioned above. All communication is done via e-mail. Diplomas can be collected physically at the Radiation Protection Unit Randwyck or can be sent by e-mail. After sending by mail, all address data will be deleted.

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	-	-
ICTS-UM	Information and Communication Technology Support – Maastricht University	-	-
Rbs	Regeling basisveiligheidsnormen stralingsbescherming	-	-
SMSR	Stralingshygiëne voor Medisch Specialisten die gebruik maken van Röntgenapparatuur	-	Radiation protection for medical specialists who use X-ray devices
TMS-MR	Toezichthoudend Medewerker Stralingsbescherming – Meet- en Regeltoepassingen	-	Radiation Protection Officer – Measurement and Control Techniques
TMS-VRS D	Toezichthoudend Medewerker Stralingsbescherming – Verspreidbare Radioactieve Stoffen op niveau D	-	Radiation Protection Officer – Dispersible Radioactive Materials at level D
UM	Universiteit Maastricht	-	Maastricht University
VWS	Ministerie van Volksgezondheid, Welzijn en Sport	-	Ministry of Health, Welfare and Sports

REFERENCES

- Besluit basisveiligheidsnormen stralingsbescherming
- Regeling basisveiligheidsnormen stralingsbescherming
- Algemene Verordening Gegevensbescherming
- 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.
Version 4 – June 2026	TMS-MR added. Accreditation number removed. Storage periods changed. Footnote 1 added. Signing for receipt of diploma removed.