

Safety Management Standard

Health Surveillance

Contents

| | |
|--|----|
| 1. Introduction..... | 3 |
| 2. What is health surveillance? | 4 |
| 3. The Law | 4 |
| 4. When is health surveillance required? | 4 |
| 5. Employers' Responsibilities | 7 |
| 6. Managers' Responsibilities | 7 |
| 7. Employees' Duties | 7 |
| 8. Occupational Health Department..... | 8 |
| 9. Records of Health Surveillance..... | 8 |
| 10. What information should be included in health records? | 9 |
| 11. Medical records | 9 |
| 12. Monitoring & Review..... | 10 |
| 13. Further Information..... | 10 |
| APPENDIX 1: Health Surveillance Requirements | 11 |
| APPENDIX 2: Health Surveillance Matrix..... | 18 |
| APPENDIX 3: Health Surveillance Referral Form | 19 |

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1. Introduction

By law employers are required to assess risks in the workplace and where necessary monitor employee's exposure to noise or vibration, ionising radiation, solvents, fumes, dusts, biological agents and other substances hazardous to health, or work in compressed air. This safety management standard gives an overview of the main requirements for health surveillance.

2. What is health surveillance?

Health surveillance is about systematically identifying the early signs of work-related ill health in employees exposed to certain health risks by:

- Providing guidance sheets or questionnaires from the Occupational Health Department detailing symptoms which workers should look out for. If these symptoms are identified then the worker should then report them to the Occupational Health Department.
- Self-examination after appropriate training from the Occupational Health Team, such as looking for skin damage on hands from using certain chemicals.
- Specific health measurements, for example lung function tests, hearing tests.
- More detailed medical examination by the Occupational Health Physician/Occupational Health Adviser.

3. The Law

Regulations that specifically identify health surveillance and the situations where such surveillance is deemed appropriate that are most relevant to the Trust's areas of work and activities are given in **appendix 1**.

4. When is health surveillance required?

Health surveillance is required when a risk assessment identifies a potential risk or risks of a work activity which pose a significant threat to the health of workers. Once this has been completed all hazards and health hazards in the workplace should be identified.

The following steps are important prior to any health surveillance being carried out:

1. Find out what the hazards are
2. Identify who might be at risk from exposure to these hazards and how
3. Decide what to do to prevent harm to health – e.g. remove the hazard altogether; reduce risks by changing the way work is done or use other controls; provide protective equipment.

If the above steps have been completed and risks still remain you will need to take further steps to protect employees.

Health surveillance is required where you answer 'yes' to *all* the following:

- Is the work known to damage health in some particular way?
- Are there valid ways to detect the disease or condition? Health surveillance is only worthwhile where it can reliably show that damage to health is starting to happen or becoming likely. A technique is only useful if it provides accurate results, is safe and practical.
- Is it reasonably likely that damage to health may occur under the particular conditions at work?
- Is surveillance likely to benefit the employee?

Health surveillance is not required where you are sure that there is no exposure or where the exposures that do take place are so rare, short and slight that there is only minimal risk of the employee being harmed. However, some substances can cause very serious illness such as cancers and for these there is often no level of exposure that can be regarded as completely safe. In these cases, health surveillance will almost always be required but may be limited to keeping health records.

Managers must advise staff should they be subject to health surveillance, as part of the local induction to ensure any base line surveillance can be undertaken.

The health surveillance matrix can be used to identify health surveillance requirements (subject to the risk assessment process) for particular hazards (**appendix 2**).

If there is any doubt about whether health surveillance is required, contact the Health and Safety Team or Occupational Health Department.

5. Employers' Responsibilities

- Ensure that competent, suitable and sufficient number of staff are appointed and trained as risk assessors.
- Ensure that staff undertake appropriate risk assessments and implement appropriate control measures for all work which poses a significant risk to the health of workers.
- Ensure appropriate resources are made available for undertaking health surveillance.
- Ensure that relevant staff attend appropriate health surveillance sessions.
- Immediately advise Health & Safety Team and Occupational Health Department of any event resulting in the accidental release of, or exposure to, substances hazardous to health.

6. Managers' Responsibilities

- Ensure that suitable and sufficient risk assessments of the work are carried out in line with Trust procedures and identify where health surveillance is required.
- Identify all employees who may require health surveillance.
- Ensure that appropriate health surveillance is identified and undertaken where necessary (**appendix 3**).
- Ensure that employees receive appropriate health surveillance from the Occupational Health Department.
- Ensure that employees comply with any guidance issued by the Occupational Health Department.
- Discuss any health surveillance requirements with the Occupational Health Department, based upon risk assessment.

7. Employees' Duties

- Attend any health surveillance sessions required by a specific risk assessment.
- Follow any health surveillance instructions issued by their manager and/or the Occupational Health Department.
- Not put their health or the health of others at risk by any of their actions or omissions.
- Tell someone (your employer, supervisor, or health and safety representative) if you think the work or inadequate precautions are putting anyone's health and safety at serious risk.

8. Occupational Health Department

- Where appropriate will issue guidance documents and provide advice on appropriate health surveillance for particular risks.
- Will undertake or will arrange for appropriate health surveillance to be provided.
- Ensure that accurate records are maintained and retained.
- Where health surveillance identifies problems with an employee's health due to work, will advise the Manager of this and recommend remedial actions.
- Will provide recommendations to Managers with regard to modifications to risk assessments to reduce the risk of work activities causing ill health.
- Provide appropriate training and guidance.
- Will provide statistics relating to health surveillance including a 6 monthly report to the Strategic Health and Safety Committee.

9. Records of Health Surveillance

All records of health surveillance performed by the occupational health department are strictly confidential. Any specific health detail of an individual's medical record can only be made available to the employer with the written informed consent of the employee to whom the record relates. Records that relate to health surveillance will be kept for at least the minimum time required by relevant and current legislation.

A health record must be kept for **all** employees under health surveillance. Records are important because they allow links to be made between exposure and any health effects.

Health records, or a copy, should be kept in a suitable form for at least 40 years or for the specified period of time in accordance with the relevant regulation, from the date of last entry because often there is a long period between exposure and onset of ill health.

10. What information should be included in health records?

Individual, up-to-date health records must be kept for each employee placed under health surveillance. These should include:

Employee details:

- surname
- forename(s)
- gender
- date of birth
- permanent address, including post code
- National Insurance number or unique reference number
- date present employment started

Recorded details of each health surveillance check:

- the date they were carried out and by whom
- the outcome of the test/check
- the decision made by the occupational health professional in terms of fitness for task and any restrictions required. This should be factual and only relate to the employee's functional ability and fitness for specific work, with any advised restrictions.

Health records are different to medical records in that they should not contain confidential medical information. Health records and medical records must therefore be kept separate to avoid any breaches of medical confidentiality.

Health records must be stored securely by occupational health department and a copy offered to individual employees when they leave employment and/or to a new occupational health service provider should this change.

11. Medical records

Medical records are compiled by a doctor or nurse and may contain information obtained from the individual during the course of health surveillance. This information may include clinical notes, biological results and other information related to health

issues not associated with work. This information is confidential and should not be disclosed without the consent of the individual.

Medical records should be kept in confidence and held by the occupational health department.

Managers should only be provided with information on fitness to work and any restrictions that may apply in that respect. Employees can have access to their own medical record through a written request under the Data Protection Act.

12. Monitoring & Review

This Safety Management Standard will be regularly monitored and reviewed by the Health and Safety Team to:

- Ensure it continues to comply with legislation
- Ensure that it is reasonably practicable to implement to all those concerned within the Trust.

13. Further Information

The Health and Safety Executive (HSE) has a range of information on risk management. General information is available at: <http://www.hse.gov.uk/risk/>. For information on specific risks consult one of our other health & safety management standards or use the search function at <http://www.hse.gov.uk/>.

We hope you find this SMS useful; if you require further information please contact one of the health and safety team:



01332 789559 or 789530



dhft.healthandsafety@nhs.net

APPENDIX 1: Health Surveillance Requirements

(Further advice is available from the Health and Safety Team/Occupational Health Department)

| The Management of Health and Safety at Work Regulations 1999 | | |
|--|--|--|
| <i>What the regulations require</i> | <i>Application of the Regulations' requirements</i> | <i>Retention of health surveillance records</i> |
| <p>Regulation 6</p> <p>Employers are required to ensure employees are provided with appropriate health surveillance in relation to risks to health and safety identified by risk assessments carried out in accordance with the Regulations</p> | <p>Risk assessments carried out under the Regulations will identify circumstances where health surveillance is required by specific health and safety regulations, e.g. Control of Substances Hazardous to Health Regulations (COSHH).</p> <p>In addition, health surveillance will be appropriate where risk assessments identify the following criteria:</p> <ul style="list-style-type: none"> a) there is an identifiable disease or adverse health effect related to employees' work; b) valid techniques are available to detect indications of the disease or health effect; c) there is a reasonable likelihood the disease or health effect may occur under particular conditions of the work; and d) the surveillance is likely to further protection of the health and safety of the employees it will cover, e.g. maintaining the effectiveness of a risk assessment and the controls implemented as a result. | <p>Good practice is to retain an individual's health surveillance record whilst they remain an employee and, once an individual's employment has ceased, whilst enquiries could still be made.</p> <p>Any records of health surveillance carried out under the Regulations will be retained for at least 40 years after the date of last entry.</p> |

| The Control of Substances Hazardous to Health Regulations 2013 | | |
|--|--|--|
| <i>What the regulations require</i> | <i>Application of the Regulations' requirements</i> | <i>Retention of health surveillance records</i> |
| <p>Regulation 11</p> <p>Where it is appropriate for the protection of the health of employees who are, or liable to be, exposed to hazardous substances, those employees will be under suitable health surveillance.</p> <p>Health surveillance is appropriate where:</p> <p>A. Exposure is to a substance, or engagement in a process specified in Schedule 6 to the Regulations and there is a reasonable likelihood that an identifiable disease will result.</p> <p>Health surveillance in these circumstances will include medical surveillance under the supervision of a relevant doctor at intervals not exceeding 12 months, or more frequent if the doctor requires. In addition, where the doctor has certified:</p> <p>I. an employee should not be engaged in work that results in exposure to a specified substance, or specifies specific conditions whilst carrying out that work, those conditions must be complied with until the doctor indicates otherwise; and</p> <p>II. Medical surveillance should be continued after exposure to a specified substance has ceased, that medical surveillance must continue whilst the employee is still employed until the doctor indicates otherwise.</p> | <p>In addition to the specific conditions given by the Regulations in relation to substances and activities given in Schedule 6 of the Regulations, examples of where health surveillance would be appropriate under the other criteria given in regulation 11 would include:</p> <p>a) Exposure to substances having recognised adverse health effects on other parts of the body, e.g. mutagens, carcinogens, biological agents and microorganisms, from where they enter, i.e. by inhalation, ingestion, skin absorption or skin puncture;</p> <p>b) Substances known to be respiratory sensitizers, cause occupational asthma; and</p> <p>c) Substances known to be skin sensitizers, cause severe dermatitis.</p> <p>Valid health surveillance techniques need to be sufficiently sensitive and specific to detect the disease or health effect related to the type and level of exposure concerned. However, the techniques should not be carried out where there is a risk of the employee's health being harmed.</p> | <p>The Regulations require that each employee subject to health surveillance, the records of that health surveillance shall be maintained and retained for at least 40 years from the date of last entry.</p> |

| | | |
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| <p>B. An employee's exposure to a hazardous substance is such that:</p> <ul style="list-style-type: none">I. an identifiable disease or adverse health effect may result;II. there is a reasonable likelihood the disease or health effect may occur under the particular conditions of the employee's work; andIII. there are valid techniques to detect the indications of the disease or health effect, and these techniques are of low risk to the employee. | | |
|--|--|--|

| The Control of Noise at Work Regulations 2008 | | |
|---|---|---|
| <i>What the regulations require</i> | <i>Application of the Regulations' requirements</i> | <i>Retention of health surveillance records</i> |
| <p>Regulation 9</p> <p>If a risk assessment carried out in accordance with the Regulations identifies employees are, or likely to be, exposed to noise levels presenting a risk to health, those employees shall be subject to suitable health surveillance.</p> <p>Where health surveillance identifies hearing damage and, in the opinion of the doctor who the affected employee is referred to, this damage is likely to have resulted from exposure to noise:</p> <p>A. The affected employee shall be subject to continued health surveillance; and</p> <p>B. A review of the health of any other employee who has been similarly exposed is undertaken.</p> | <p>The Regulations give both lower and upper action values. These values are:</p> <p><i>Lower action values</i></p> <ul style="list-style-type: none"> • 80dB average daily or weekly exposure; and • 135dB peak single exposure. <p><i>Upper action values</i></p> <ul style="list-style-type: none"> • 85dB average daily or weekly exposure; and • 137dB peak single exposure <p>Health surveillance will be required where employees are regularly exposed above the upper action values.</p> <p>Where an employee is regularly exposed between the lower and upper action values or occasionally above the upper action value, health surveillance should be provided if the particular employee is sensitive to noise, e.g. through previous exposures.</p> | <p>There is no prescribed time period for the retention of records of health surveillance carried out under the Regulations.</p> <p>Good practice is to retain an individual's health surveillance record whilst they remain an employee and, once an individual's employment has ceased, whilst enquiries could still be made.</p> <p>Any records of health surveillance carried out under the Regulations will be retained for at least 40 years after the date of last entry.</p> |

| The Control of Vibration at Work Regulations 2005 | | |
|---|---|---|
| <i>What the regulations require</i> | <i>Application of the Regulations' requirements</i> | <i>Retention of health surveillance records</i> |
| <p>Regulation 7</p> <p>Employees shall be subject to suitable health surveillance if a risk assessment, carried out in accordance with the Regulations indicates:</p> <p>A. A risk to the health of employees exposed, or liable to be exposed, to vibration; or</p> <p>B. Employees are likely to be exposed to vibration at or above an exposure action value.</p> <p>Suitable health surveillance is considered appropriate where exposure to vibration is such that:</p> <p>I. a link can be established between the exposure and an identifiable disease or adverse health effect;</p> <p>II. the disease or health effect may occur under the circumstances of the employee's work; and</p> <p>III. there are valid detection techniques for the disease or health effect.</p> | <p>Hand-arm vibration syndrome</p> <p>Health surveillance should be provided for vibration exposed employees, i.e. those undertaking activities involving the use of hand-held vibrating tools where:</p> <p>a) exposure is likely to be regularly above the action value of 2.5m/s² A(8) as given by the Regulations;</p> <p>b) exposure is likely to be occasionally above the action value and the risk assessment identifies the frequency and severity of exposure may pose a risk to health; and</p> <p>c) employees are identified as particularly sensitive to vibration, e.g. previously diagnosed as suffering from hand-arm vibration syndrome.</p> <p>Whole body vibration</p> <p>Guidance accompanying the Regulations identifies health surveillance as not appropriate. There are no methods that exist for the detection, or indicate the early onset, of adverse health effects associated with whole body vibration, i.e. lower back pain, that are specifically related to work. The guidance that accompanies the Regulations suggests an approach of reporting and monitoring the symptoms of lower back pain to assist in assessing the need for action on whole body vibration. This 'health monitoring' approach is not a legal requirement under the Regulations.</p> | <p>There is no prescribed time period for the retention of records of health surveillance carried out under the Regulations.</p> <p>Good practice is to retain an individual's health surveillance record whilst they remain an employee and, once an individual's employment has ceased, whilst enquiries could still be made.</p> <p>Any records of health surveillance carried out under the Regulations will be retained for at least 40 years after the date of last entry.</p> |

| Ionising Radiations Regulations 1999 | | |
|--|---|--|
| <i>What the regulations require</i> | <i>Application of the Regulations' requirements</i> | <i>Retention of health surveillance records</i> |
| <p>Regulation 7</p> <p>Before commencing a new activity involving work with ionising radiation in respect of which no risk assessment has been made, the employer shall make a suitable and sufficient assessment of the risk to any employee and other person for the purpose of identifying the measures he needs to take to restrict the exposure of that employee or other person to ionising radiation.</p> <p>Regulation 24</p> <p>Employees exposed to ionising radiations as a result of work activities need to be designated as a classified persons in accordance of regulation 20 and certified as fit for the intended type of work within the last 12 months. This may require a medical examination and continuing medical surveillance by an appointed doctor (or employment medical adviser).</p> <p>Arrangements will also need to be made for adequate medical surveillance for any employee who has received an overexposure, whether or not that employee has been designated as a classified person.</p> | <p>Classified person</p> <p>Any employee who works with any source of ionising radiation which is capable of giving rise to a dose rate such that it is reasonably foreseeable an employee could receive an effective dose greater than 20 millisieverts or an equivalent dose in excess of a dose limit within several minutes should be designated as a classified person.</p> <p>Adequate medical surveillance should include:</p> <ul style="list-style-type: none"> A. a medical examination before first being designated as a classified person in a post involving work with ionising radiations; B. periodic reviews of health at least once every year; C. special medical surveillance of an employee when a relevant dose limit has been exceeded; D. determining whether specific conditions are necessary; and E. a review of health after cessation of work where this is necessary to safeguard the health of the individual. | <p>A health record, containing the particulars referred to in Schedule 7, in respect of each of his employees to whom this regulation relates is made and maintained and that that record or a copy thereof is 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 50 years from the date of the last entry made in it.</p> |

| Control of Lead at Work Regulations 2002 | | |
|---|---|---|
| <i>What the regulations require</i> | <i>Application of the Regulations' requirements</i> | <i>Retention of health surveillance records</i> |
| <p>Regulation 10</p> <p>Every employer shall ensure that each of his employees who is or is liable to be exposed to lead is under suitable medical surveillance by a relevant doctor where -</p> <p>(a) the exposure of the employee to lead is, or is liable to be, significant;</p> <p>(b) the blood-lead concentration or urinary lead concentration of the employee is measured and equals or exceeds the levels detailed in the regulations; or</p> <p>(c) a relevant doctor certifies that the employee should be under such medical surveillance.</p> | <p>Initial medical assessment</p> <p>The employer should notify the doctor of the name of each person newly employed or whom it is intended to employ on work which is likely to expose that person significantly to lead so that the doctor can carry out the initial medical assessment.</p> <p>Periodic medical assessments</p> <p>These should be carried out and consist of:</p> <p>(a) measurement of blood-lead concentrations;</p> <p>(b) at least once a year, a clinical assessment</p> <p>At the doctor's discretion, other relevant biological tests may be carried out annually such as measuring the employee's haemoglobin and/or zinc protoporphyrin (ZPP).</p> | <p>Medical surveillance records should be kept available for at least 40 years as they could provide useful occupational hygiene data.</p> |

APPENDIX 2: Health Surveillance Matrix

| SURVEILLANCE TYPE <i>(This list is not exhaustive and advice is available from the Health and Safety Team and Occupational Health Dept. in relation to Health Surveillance)</i> | HAZARD | | | | | | | | | | | | | | | RECOMMENDED MINIMUM FREQUENCY |
|--|------------|---|-------------------------------|----------------|--------------------------|------------------|--------------------|------|--------------|-----------------|-------|------------|--------|-----------|-------------------|-------------------------------|
| | Biological | Chemical – respiratory (sensitisers) | Chemical – skin (sensitisers) | Confined space | Display Screen Equipment | Driving for work | Ionising radiation | Lead | Lone working | Manual handling | Noise | Night work | Stress | Vibration | Working at height | |
| Pre-employment questionnaire | Red | Red | Red | Yellow | Yellow | Yellow | Red | Red | Yellow | Yellow | Red | Red | Yellow | Red | Yellow | Once only pre-employment |
| Pre-employment assessment/medical | Red | Red | Red | Yellow | Green | Green | Red | Red | Green | Green | Red | Red | Yellow | Red | Yellow | Once only pre-employment |
| Specific medical surveillance | | | | | | | Red | Red | | | | | | | | As determined by assessment |
| Audiometry health check | | | | | | | | | | | Red | | | | | On employment, 6mths/36mths |
| Eye sight test | | | | | Red | Green | | | | | | | | | | On employment and annually |
| General Health/lifestyle questionnaire/assessment | | | | | | Green | | | | | | Green | Green | | | As determined by assessment |
| Musculoskeletal questionnaire/assessment | | | | | | | | | Yellow | | | | | | | As determined by assessment |
| Night worker questionnaire/assessment | | | | | | | | | | | | Red | | | | On employment/annually |
| Respiratory health check | | Red | Red | | | | | | | | | | | | | Pre- employment/annually |
| Skin health check | | Red | Red | | | | | | | | | | | | | On employment/annually |
| Vibration health check | | | | | | | | | | | | | | Red | | On employment/annually |
| Biological monitoring | Red | Red | Red | | | | Red | Red | | | | | | | | As determined by assessment |
| Workplace stress health assessment | | | | | | | | | | | | | Yellow | | | As determined by assessment |
| KEY TO CODING | Red | MANDATORY (dependant on risk assessment – risk assessment required) | | | | | | | | | | | | | | |
| | Yellow | STRONGLY RECOMMENDED – (best practice - risk assessment required) | | | | | | | | | | | | | | |
| | Green | DISCRETIONARY (not legally required however good business sense) | | | | | | | | | | | | | | |

APPENDIX 3: Health Surveillance Referral Form

Please return the completed referral form to Occupational Health, Level 1, London Road Community Hospital, London Road, Derby, DE1 2QY

| | |
|---------------------------------|--|
| Name of department: | |
| Name of department contact: | |
| Email address and phone number: | |

The following persons have been identified as requiring Health Surveillance for the following hazards.

| Name/Job Role | Contact No. | Biological | Chemical – respiratory (sensitisers) | Chemical – skin (sensitisers) | Confined space | Display Screen Equipment | Driving for work | Ionising radiation | Lead | Lone working | Manual handling | Noise | Night work | Stress | Vibration | Working at height | Other |
|---------------|-------------|------------|--------------------------------------|-------------------------------|----------------|--------------------------|------------------|--------------------|------|--------------|-----------------|-------|------------|--------|-----------|-------------------|-------|
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