**FQM LIMITED**

**XXX-OP-012**

**Health Surveillance Procedure**

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| **Revision History** | | | | |
| **Rev No.** | **Description of Change** | **Reviewed by** | **Approved By** | **Date** |
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1. **Purpose**

The purpose of this procedure is to protect the health of individuals by detecting as early as possible diseases or adverse health effects which may be work-related, i.e. exposure to excessive noise, vibration or hazardous substances. The procedure is intended to ensure the effectiveness of the existing risk management measures and identify at any stage any further action that may be necessary.

1. **Scope**

This procedure applies to all [COMPANY NAME] employees conducting work in the workshop.

1. **Relevant Documentation**

Risk Assessments

1. **Definition**

Health Surveillance is a system of ongoing health checks. These health checks may be required by law for employees who are exposed to noise or vibration, ionising radiation, solvents, fumes, dusts, biological agents or other substances hazardous to health.

1. **Responsibilities – Duty of Care**

Management have overall responsibility for ensuring arrangements are in place that:

* Ensure appropriate risk assessments take account of health surveillance requirements.
* Identify and inform staff groups for whom health surveillance is required.
* Immediately advise QHSE of any event resulting in the accidental release of, or exposure to, substances hazardous to health.
* Ensure staff requiring health surveillance are able to attend the programme that is established for them.

QHSE is responsible for:-

* Ensuring that all risk assessments are fully aware of health surveillance requirements and the arrangements to follow where a need, or potential need, is identified.
* Ensure adequate and up to date records are maintained.
* Maintaining awareness of health and safety legislation, guidelines and evidence for health surveillance programmes.
* Coordinate and assist in the delivery of timely and relevant health surveillance programmes at times and locations to suit the needs of services requiring them.
* Identify staff that may be at risk of work related ill health on the basis of post-employment questionnaire.
* Advise managers and subjects of health surveillance regarding outcomes, fitness for work status and any recommended restrictions in work practice.
* Advise management regarding any personnel not attending programmes.
* Maintain health surveillance records in accordance with current legislation and guidelines.

1. **Procedures**
   1. **Health Surveillance Programme**

All new employees shall be subject to a baseline health assessment questionnaire conducted by an appointed provider. The questionnaire shall assist the provider in identifying any additional assessment required.

* 1. **Management of Health and Safety at Work Regulations**

Regulation 6 of the Management of Health and Safety at Work Regulations requires that 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.

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).

In addition, health surveillance will be appropriate where risk assessments identify the following criteria.

There is an identifiable disease or adverse health effect related to employees’ work;

Valid techniques are available to detect indications of the disease or health effect;

There is a reasonable likelihood the disease or health effect may occur under particular conditions of the work; and

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.

* 1. **The Control of Substances Hazardous to Health Regulations**

Regulation 11 states that 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. Health surveillance is appropriate where:

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.

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:

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

Medical surveillance should be continued after exposure to a specified substance has ceased whilst the employee is still employed until a relevant doctor indicates otherwise.

* An employee’s exposure to a hazardous substance is such that:
* An identifiable disease or adverse health effect may result;
* There is reasonable likelihood the disease or health effect may occur under the particular conditions of the employee’s work; and
* There are valid techniques to detect the indications of the disease or health effect, and these techniques are of low risk to the employee.

In addition to the specific conditions given by the Regulations in relation to substances and activities given in Schedule 6 to the Regulations, examples of where health surveillance would be appropriate under the other criteria given in regulation 11 would include: -

* Exposure to substances having recognised adverse health effects on other parts of the body, e.g. mutagens, carcinogens, biological agents and mirco-organisms, from where they enter, i.e. by inhalation, ingestion, skin absorption or skin puncture;
* Substances known to be respiratory sensitisers, cause occupational asthma; and;
* Substances known to be skin sensitisers, cause severe dermatitis.

Valid health surveillance techniques need to be sufficient 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.

* 1. **Control of Noise at Work Regulations**

Regulation 9 states that 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.

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:

* The affected employee shall be subject to continued health surveillance; and
* A review of the health of any other employee who has been similarly exposed is undertaken
* The Regulations give both lower and upper action values. These values are:

Lower action values

80dB average daily or weekly exposure; and

135dB peak single exposure.

Upper action values

85dB average daily or weekly exposure; and

137dB peak single exposure.

Health surveillance will be required where employees are regularly exposed above the upper action values.

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.

* 1. **The Control of Vibration at Work Regulations**

Regulation 7 states that employees shall be subject to suitable health surveillance if a risk assessment, carried out in accordance with the Regulations indicates:

* A risk to the health of employees exposed, or liable to be exposed, to vibration; or
* Employees are likely to be exposed to vibration at or above an exposed action value.

Suitable health surveillance is considered appropriate where expose to vibration is such that:

* A link can be established between the exposure and an identifiable disease or adverse health effect;
* The disease or health effect may occur under the circumstances to the employee’s work; and
* There are valid detection techniques for the disease or health effect.

In consideration of hand-arm vibration syndrome, Health surveillance should be provided for vibration-exposed employees, i.e. those undertaking activities involving the use of hand-held vibrating tools where:

Exposure is likely to be regularly above the action value of 2.5m/s² A(8) as given by the Regulations;

* 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
* Employees are identified as particularly sensitive to vibration, e.g. previously diagnosed as suffering from hand-arm vibration syndrome.

Whole body vibration

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.

Whilst formal health surveillance is not identified as required, 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.

* 1. **Control of Records**

There is no prescribed time period for the retention of records of health surveillance carried out under the Regulations.

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.

Any records of health surveillance carried out under the Regulations will be retained for at least 40 years after the date of last entry.