

ESTATES OPERATIONS

HEALTH & SAFETY DOCUMENT

CODE of PRACTICE

DOCUMENT TITLE

OCCUPATIONAL HEALTH

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Please Note – the guidance provided in this Code of Practice pertains only to the Estates Operations Group and its activities. For Imperial College’s Health & Safety policies and Codes of Practice go to: <https://imperial.ac.uk/safety>.

INTRODUCTION

This Code of Practice sets down the standards for safe management of occupational health, including, musculoskeletal disorders, skin diseases, noise, and hand arm vibration. It is intended to assist in meeting the requirements of current legislation and sets out procedures on how to achieve safe systems of work within the College.

Over and above the general duty of care owed by the College to its staff, students and others under the Health and Safety at Work etc. Act 1974, all work relating to occupational health is legislated by the Control of Vibration at Work Regulations 2005, the Control of Noise at Work Regulations 2005, Personal Protective Equipment at Work Regulations 1992 and the Control of Substances Hazardous to Health Regulations 2002 (as amended).

This Code of Practice provides the following:

- A definition and the scope of the applicable Regulations
- The duties imposed on the employer / employees / other
- Responsibilities of duty holders and employees

1. Overview and Introduction to Occupational Health

Control of Substances Hazardous to Health Regulations 2002 (as amended) COSHH provides a legal framework to protect people against health risks from hazardous substances used at work. It applies wherever there is a risk at work of health effects from skin exposure to hazardous substances. For further guidance please refer to Estates Operations’ [Code of Practice on Substances Hazardous to Health](#).

Personal Protective Equipment at Work Regulations 1992 These Regulations concern the design, construction, testing and certification of protective clothing and other types of PPE. They require PPE to be cleaned, maintained, used and stored properly. For further guidance please refer to Estates Operations’ [Code of Practice on PPE](#).

Workplace (Health, Safety and Welfare) Regulations 1992 Employers have a general duty under section 2 of the Health and Safety at Work etc Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare of their employees at work. People in control of non-domestic premises have a duty (under section 4 of the Act) towards people who are not their employees but use their premises. The Regulations expand on these duties

and are intended to protect the health and safety of everyone in the workplace, and ensure that adequate welfare facilities are provided for people at work.

Control of Vibration at Work Regulations 2005 The Control of Vibration at Work Regulations require employers to prevent or reduce risks to health and safety from exposure to vibration at work. Employees have duties under the regulations too. Further guidance can be found in [Appendix 1](#) to the rear of this Code of Practice.

The Control of Noise at Work Regulations 2005 require employers to prevent or reduce risks to health and safety from exposure to noise at work. Employees have duties under the Regulations too. Further guidance can be found in [Appendices 2 & 3](#) to the rear of this Code of Practice.

The Manual Handling Regulations 1992 require all employers, so far as reasonably practicable, to avoid the need for their employees to undertake any manual handling operation that involves the risk of their being injured. Further guidance can be found in Estates Operations' [Code of Practice on Manual Handling](#).

The Display Screen Equipment (DSE) Regulations 1992 (amended 2002) require all employees to undertake a Display Screen Equipment assessment of their workstation, whether they work in the employer's offices, at a workstation at home, or at another employer's work station. Further information can be found in the [College's general guidance for those using computer equipment](#).

2. Duties Imposed on the Employer/Employees/Others

The Control of Vibration at Work Regulations, The Control of Noise at Work Regulations 2005 (Noise Regulations 2005), Personal Protective Equipment at Work Regulations 1992, The Control of Substances Hazardous to Health Regulations 2002 (as amended) and the Health and Safety Act 1974 have requirements to protect the health and safety of everyone in the workplace. To this end Estates Operations should appoint a suitably competent person(s) to carry out the actions below.

Skin

The College has legal duties to assess the health risks from skin exposure to hazardous substances at work. They must prevent or, where this is not reasonably practicable, adequately control exposure to the hazards by using and maintaining suitable controls.

Hazardous substances include:

- substances/products used directly in work activities (e.g. adhesives, paints, cleaning products);
- substances generated during work activities (e.g. rosin fumes from soldering, metal fumes from welding, wood dust from sanding);
- naturally occurring substances (e.g. grain dust, flour);
- biological agents (e.g. bacteria).

We therefore:

- Assess the risk of skin exposure to hazardous substances at work;
- Manage the risks to prevent ill health;
- Avoid or reduce contact with hazardous substances;
- Provide suitable PPE where necessary;
- Provide information, instruction and training to employees.

Hand arm vibration

The Control of Vibration at Work Regulations require us to:

- assess the vibration risk to employees;

- decide if employees are likely to be exposed above the daily exposure action value (EAV) and if they are:
 - introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable;
 - provide health surveillance (regular health checks) to those employees who continue to be regularly exposed above the action value or otherwise continue to be at risk;
- decide if they are likely to be exposed above the daily exposure limit value (ELV) and if they are:
 - take immediate action to reduce their exposure below the limit value;
- provide information and training to employees on health risks and the actions we are taking to control those risks;
- consult trade union safety representatives or employee representatives on proposals to control risk and to provide health surveillance;
- keep a record of risk assessment and control actions;
- keep health records for employees under health surveillance;
- review and update risk assessments regularly.

Noise

The Control of Noise at Work Regulations 2005 require us to:

- Conduct a risk assessment if any employee is likely to be exposed to noise at or above the lower exposure action values. A person's daily noise exposure depends on both noise level and length of exposure (See [Appendix 2](#));
- Measure the noise exposure to employees;
- Give particular consideration within the risk assessment to people with a pre-existing hearing condition, those with a family history of deafness (if known), pregnant women and young people;
- Keep health records for employees under health surveillance;
- Arrange to receive health surveillance data (anonymised and grouped to protect medical-in-confidence information about individual workers) relating to the business. This will indicate whether new cases of noise-induced hearing loss are developing or whether existing cases have worsened. This will help decide whether the risk is being controlled effectively and whether there is a need to do more to control it;
- Review and update the risk assessment regularly;
- Provide information and training to employees on health risks and the actions you are taking to control those risks;
- Take action to eliminate risks from noise exposure completely wherever it is reasonably practicable to do so;
- If it is not reasonably practicable to eliminate the risks completely, to reduce them to as low a level as is reasonably practicable;
- Introduce a formal programme of measures to reduce noise exposure whenever an employee's exposure to noise is likely to exceed the upper exposure action values;
- Not to expose anyone above the exposure limit values;
- Carry out maintenance of machinery, carried out in accordance with the manufacturer's recommendations.

Personal hearing protection should only be used:

- where there is a need to provide additional protection beyond what has been achieved through noise-control measures;
- as an interim measure while you are developing those control measures.

Personal hearing protection should be provided:

- Where employees are exposed between the lower and upper exposure action and employees request them.
- Where employees are likely to be exposed at or above the upper exposure action values

People are often reluctant to use hearing protectors, and even where they start to use them they can easily get out of the habit. We therefore need to introduce a systematic programme to ensure they are used, taking into account the following:

- The College's safety policy, which should include a clear commitment to using personal protection;
- Signs and warning notices to ensure awareness of where and when protectors should be used;
- Clear responsibilities. We should identify who is responsible for the hearing protection programme and the distribution and maintenance of protectors;
- Information, instruction and training for all employees on the risks and the action they should take;
- Records which should include details of the issue of hearing protectors, arrangements for ensuring users know where and how to use them, and any problems that people encounter when using them;
- Monitoring including spot checks to find out whether the hearing protectors are being used.

We should keep a record and introduce a system to enable people to report deficiencies to a person with responsibility and authority for remedial action.

Musculoskeletal disorders

The Workplace (Health, Safety and Welfare) Regulations 1992 and the Health and Safety at Work Act 1974 have requirements to protect the health and safety of everyone in the workplace, and ensure that adequate welfare facilities are provided for people at work. To this end we have appointed suitably competent persons to carry out the actions below.

- assess the risk to the health and safety of their employees and to anyone else who may be affected by their activities, so that the necessary preventive and protective measures can be identified;
- the assessment should take into account risks relating to new or expectant mothers (this is relevant because pregnancy can affect musculoskeletal disorders (MSD) risks due to hormonal changes which affect ligaments, posture, blood pressure and cause fatigue);
- make arrangements for putting into practice the health and safety measures that follow from the risk assessment. This covers planning, organisation, control, monitoring and review, i.e. the management of health and safety;
- provide such health surveillance as is appropriate having regard to the health and safety risks which are identified by the assessment;
- devise and apply the measures needed to comply with employers' duties under health and safety law;
- give employees information about health and safety matters;
- co-operate with any other employers who share a work site;
- provide information to people working in their undertaking who are not their employees;
- make sure that employees have adequate health and safety training and are capable enough at their jobs to avoid risk; and give some particular health and safety information to temporary workers, to meet their special needs.
- consult employees' safety representatives and provide facilities for them. Consultation must take place on such matters as the introduction of measures that may substantially affect health and safety; the arrangements for appointing competent persons; health and safety information and training required by law; and health and safety aspects of new technology being introduced to the workplace.

Manual Handling

The Manual Handling Regulations 1992 require all employers, so far as reasonably practicable, to avoid the need for their employees to undertake any manual handling operation that involves the risk of their being injured. The College recognises the seriousness of injury caused through the use of poor manual handling techniques.

The College will assess the manual handling activities undertaken by its staff and students. Where applicable, mechanical aids are to be used to eliminate the need for manual handling. Further guidance can be found in Estates Operations' [Code of Practice on Manual Handling](#) and our Safety Guidance webpage.

Display Screen Equipment

The College recognises that serious injury can be caused through poor posture at the workstation. The possible risk factors associated with display screen equipment use are mainly those leading to musculoskeletal problems.

The College will decide which of their employees are display screen equipment users, ensuring that a competent person assists with the undertaking of at least an annual workstation assessment. Further information on the [College's general guidance for those using computer equipment](#) can be found on this link.

3. Responsibilities of Duty Holders and Employees

The College has a responsibility to protect the health and safety of everyone in the workplace. To this end we have appointed suitably competent persons to carry out the actions below.

- Ensure the risks to skin through hazardous substances are assessed and control measures implemented;
- Monitor the exposure to hand arm vibration and impose control measures where appropriate;
- Monitor the exposure to noise and impose control measures where appropriate;
- Ensure the risks of MSDs are assessed and control measures implemented;

Employees and students have a responsibility not to undertake any activities within the workplace that may cause themselves or others harm and adhere to the information, instruction and training provided. They must immediately bring instances having the potential to cause harm to the attention of their immediate line manager.

Appendix 1 – Legislation Guidance

Control of Vibration at Work Regulations 2005

The Control of Vibration at Work Regulations require us as an employer to:

- Assess the vibration risk to your employees;
- Take action to reduce vibration exposure that produces those risks
- Decide if employees are likely to be exposed above the:
 - Daily exposure action value (EAV) and if they are:
 - introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable;
 - Daily exposure limit value (ELV) and if they are:
 - take immediate action to reduce their exposure below the limit value;
- Make sure the legal limits on vibration exposure are not exceeded;
- Provide information and training to employees on health risks and the actions we are taking to control those risks;
- Carry out health surveillance (regular health checks) where there is a risk to health;
- Consult trades union safety representatives or employee representatives on proposals to control risk and to provide health surveillance;
- Keep a record of our risk assessment and control actions;
- Keep health records for employees under health surveillance;
- Review and update risk assessments regularly.

The Control of Noise at Work regulations 2005

The Regulations require us as an employer to:

- Assess the risks to our employees from noise at work;
- Take action to reduce the noise exposure that produces those risks;
- Provide our employees with hearing protection if we cannot reduce the noise exposure enough by using other methods;
- Make sure the legal limits on noise exposure are not exceeded;
- Provide our employees with information, instruction and training;
- Carry out health surveillance where there is a risk to health.

Appendix 2 - Hand Arm Vibration / Noise Calculators

Hand Arm Vibration

Estates Operations staff are advised to use the hand-arm vibration calculator which is available for free from the HSE website. The calculator can be used online or can be downloaded and used in the form of an Excel spreadsheet.

Prior to using the calculator for the first time, users are recommended to read the guidance documents which can be accessed from the below link:

<http://www.hse.gov.uk/vibration/hav/calcinst.htm>

Following this the calculator can be accessed online or downloaded from the below link:

<http://www.hse.gov.uk/vibration/hav/vibrationcalc.htm>

Noise

These noise exposure calculators can help us calculate daily noise exposure, weekly noise exposures, and estimate the performance of hearing protection.

The calculators are available online or download from the HSE website and can be accessed from the following links:

<http://www.hse.gov.uk/noise/calculator.htm>

Appendix 3 – Guidance Documents

Managing skin exposure risks at work.

This guide provides information about the legal requirements of managing exposure risks to skin within the workplace.

The guidance documents are available at the following link:

<http://www.hse.gov.uk/pubns/hsg262.pdf>

Control the risks from hand-arm vibration

This guide provides information and guidance on the legal requirements of controlling the risks from hand-arm vibration.

The guidance documents are available at the following link:

<http://www.hse.gov.uk/pubns/indg175.pdf>

Further guidance is contained in [Appendix 2](#) in the form of the hand-arm vibration calculator available for download from the HSE website.

Noise at Work

This guide provides information and guidance on the legal requirements of controlling risk from noise in the workplace.

The guidance documents are available at the following link:

<http://www.hse.gov.uk/pubns/indg362.pdf>

Further guidance is contained in [Appendix 2](#) in the form of daily/weekly noise calculators available for download from the HSE website.

Musculoskeletal Disorders

Further guidance on the assessment of risk from musculoskeletal disorders is available in the [College's general guidance for those using computer equipment](#) and Estates Operations' [Code of Practice on PPE](#).

Further information can also be obtained from the HSE website, accessed via the below link:

<http://www.hse.gov.uk/msd/faq-uld.htm>