



## HEALTH & SAFETY NOTICE

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### LEAD SAFETY POLICY

#### **General**

This Health & Safety notice must be read and understood by all employees of Vacman Cleaning Ltd undertaking work which involves cleaning in areas where lead may be present or where lead removal, storage or transportation is involved.

#### **Legal Responsibilities**

Under The Control of Lead at Work Regulations 2002 Vacman Cleaning Ltd has a duty of care towards our employees to ensure that they are fully protected from the effects of lead in any premises or part of premises used for or in connection with our work. Pregnant women or young persons under 18 years are not allowed to carry out work which exposes them to lead. It is the responsibility of all female employees, to advise the Managing Director, prior to commencing work with lead, if they believe that they may be pregnant.

Vacman Cleaning Ltd also has a duty of care in respect of any other person, whether at work or not, who may be affected by the work carried. These duties, however, do not extend to monitoring of persons who are not our employees unless those persons are on the premises where the work is being carried out or are employees of a sub contractor of Vacman Cleaning.

#### **Assessment of the Risks to Health**

No work which is liable to expose any employees to lead shall be carried out by a person employed by Vacman Cleaning Ltd unless a suitable risk assessment has taken place in accordance with Vacman Health & Safety Policy (HSN -36)

The risk assessment shall include consideration of -

- (a) the hazardous properties of the lead;
- (b) information on health effects provided by the supplier, including information contained in any relevant safety data sheet;
- (c) the level, type and duration of exposure;
- (d) the circumstances of the work, including the amount of lead involved;
- (e) activities where there is the potential for a high level of exposure;

- (f) any relevant occupational exposure limit, action level and suspension level;
  - (g) the effect of preventive and control measures which have been or will be taken in accordance with regulation 6;
  - (h) the results of relevant medical surveillance;
  - (i) the results of monitoring of exposure;
  - (j) in circumstances where the work will involve exposure to lead and another substance hazardous to health, the risk presented by exposure to those substances in combination;
  - (k) whether the exposure of any employee to lead is liable to be significant; and
  - (l) Any additional information needed in order to complete the risk assessment.
- (3) The risk assessment shall be reviewed regularly particularly if -
- (a) there is reason to suspect that the risk assessment is no longer valid;
  - (b) there has been a significant change in the work to which the risk assessment relates;
  - (c) the results of any monitoring carried out show it to be necessary; or
  - (d) the blood-lead concentration of any employee under medical surveillance equals or exceeds the action level,

**Prevention or control of exposure to lead**

The Managing Director Vacman Cleaning shall ensure that the exposure of our employees to lead is either prevented or, where this is not reasonably practicable, adequately controlled. In complying with his duty of prevention, the use of lead in the workplace will be avoided by replacing it with a substance or process which, under the conditions of its use, either eliminates or reduces the risk to the health of our employees.

Where it is not reasonably practicable to prevent exposure to lead, protection measures appropriate to the activity and consistent with the risk assessment shall be applied, including, in order of priority -

- (a) the design and use of appropriate work processes, systems and engineering controls and the provision and use of suitable work equipment and materials;
  - (b) the control of exposure at source, including adequate ventilation systems and appropriate organizational measures; and
  - (c) where adequate control of exposure cannot be achieved by other means, the provision of suitable personal protective equipment in addition to the above measures.
- (4) These measures will include -

- (a) arrangements for the safe handling, storage and transport of lead, and of waste containing lead, at the workplace and the adoption of suitable maintenance procedures;
- (b) reducing, to a minimum, the number of employees subject to exposure as well as the level and duration of exposure, and the quantity of lead present at the workplace;
- (c) Control of the working environment, including appropriate general ventilation; and
- (e) Appropriate hygiene measures including adequate washing facilities.

Where the exposure of an employee to lead is liable to be significant, all relevant employees of Vacman Cleaning Ltd shall be provided with suitable and sufficient protective clothing in accordance with the Personal Protective Equipment Regulations. It is the employees responsibility to, at all times while working in areas where lead is present, use any protective clothing provided and to inspect it regularly for defects.

#### **Use, Care and Maintenance of Control Measures**

Every employee of Vacman Cleaning Ltd must make full and proper use of any control Measures provided for their protection and shall take all reasonable steps to ensure it is returned after use. If a defect is discovered it must be immediately reported to their line manager. If in doubt about any defect contact 0800 783 6103 immediately.

#### **Eating, drinking and smoking**

Employees must not eat, drink or smoke in any place which they have reason to believe is contaminated by lead. This prohibition extends to any vehicles used to transport lead. Where necessary, Vacman Cleaning may make arrangements for the provision and use of safe welfare facilities in a place which is liable to be contaminated by lead. Where these are provided employees must use them while on site. Employees are advised to maintain high standards of hygiene while working with lead. The most common way to ingest lead is through the mouth. Employees are reminded to always remove any contaminated protective clothing, thoroughly wash hands face after working with lead and before eating or smoking

#### **Maintenance, examination and testing of control measures**

Management of Vacman cleaning Ltd shall ensure that any relevant control measure is maintained in an efficient state, in efficient working order, in good repair and in a clean condition. Where engineering controls are provided the Company shall ensure that thorough examination and testing of those controls is carried out -

- (a) in the case of local exhaust ventilation plant, at least once every 14 months; and
- (b) in any other case, at suitable intervals.

Where respiratory protective equipment (other than disposable respiratory protective equipment) is provided Line Managers and Employees of Vacman Cleaning Ltd shall ensure that thorough examination and, where appropriate, testing of that equipment is carried out at suitable intervals.

A record of the examinations and tests carried out and of repairs carried out as a result of those examinations shall be kept available for at least 5 years from the date on which it was made by

the Managing Director. Any defects should be reported immediately.

### **Personal Protective Equipment**

All employees of Vacman Cleaning Ltd engaged in lead work shall ensure that personal protective equipment, including protective clothing, that has been issued is properly stored in a well-defined place, checked at suitable intervals and when discovered to be defective, repaired or replaced before further use. Personal protective equipment which may be contaminated by lead shall be removed on leaving the working area and kept apart from uncontaminated clothing and equipment.

### **Air Monitoring**

Where the risk assessment indicates that any employees are liable to receive significant exposure to lead, Vacman Cleaning Ltd shall ensure that the concentration of lead in air to which employees are exposed is measured at least every 3 months. The only exception shall be where the exposure arises wholly or in part from exposure to lead alkyls, when the interval between each occasion of monitoring may be increased to a maximum of 12 months.

This extension will apply only when there has been no material change in the work or the conditions of exposure since the last occasion of monitoring and the lead in air concentration for each group of employees or work area has not exceeded  $0.10 \text{ mg/m}^3$  on the two previous consecutive occasions on which monitoring was carried out.

The managing Director of Vacman Cleaning Ltd shall ensure that a record of monitoring carried out for the purpose of this regulation is maintained and that that record is kept available for at least 5 years. Employees may request copies of these records at any reasonable time.

### **Medical surveillance**

All employees of Vacman Cleaning Ltd who are liable to be exposed to lead shall be required to undergo medical surveillance by a Doctor, not only where the exposure of the employee to lead is likely to be significant but, after any single period of exposure that lasts more than 30 working days. Under the CLAW 2002 Regulations significant means when the blood-lead concentration or urinary lead concentration of the employee is measured and equals or exceeds the levels detailed below.

### **Blood/ Lead Concentration**

- (i) in respect of a woman of reproductive capacity,  $20 \text{ } \mu\text{g/dl}$ , or
- (ii) in respect of any other employee,  $35 \text{ } \mu\text{g/dl}$ ; or

### **Urinary/ Lead concentration of -**

- (i) in respect of a woman of reproductive capacity,  $20 \text{ } \mu\text{g Pb/g creatinine}$ , or
- (ii) in respect of any other employee,  $40 \text{ } \mu\text{g Pb/g creatinine}$ .

Where an employee is required, under regulation 10 of the CLAW Regulations, to undergo medical surveillance an individual record of any monitoring will be maintained by the Managing Director and kept in respect of that employee.

Where lead exposure is assessed as being significant, medical surveillance shall commence before an employee begins any work giving rise to exposure to lead. Where lead exposure is assessed as insignificant surveillance will commence within 30 working days. Subsequent surveillance shall be conducted at intervals of not more than 12 months or any such shorter intervals as the Company Doctor may advise. It will be the responsibility of all relevant employees to comply with any request to undergo medical surveillance.

### **Suspension Levels**

In certain circumstances the CLAW Regulations may require the company to suspend employees from working with or around lead because surveillance has identified that their blood concentration of lead has reached the suspension level. The "suspension level" means

(a) a blood-lead concentration of –

- (i) in respect of a woman of reproductive capacity, 30 µg/dl,
- (ii) in respect of a young person, 50 µg/dl, or
- (iii) in respect of any other employee, 60 µg/dl; or

(b) a urinary lead concentration of -

- (i) in respect of a woman of reproductive capacity, 25 µg Pb/g creatinine, or
- (ii) in respect of any other employee, 110 µ Pb/g creatinine;

Biological monitoring shall be carried out in respect of an employee at least every 6 months. Where the results of the measurements for individuals or for groups of workers have shown on the previous two consecutive occasions on which monitoring was carried out a lead in air exposure greater than 0.075 mg/m<sup>3</sup> but less than 0.100 mg/m<sup>3</sup> and where the blood-lead concentration of any individual employee is less than 30 µg/dl, the frequency of monitoring may be reduced to once a year.

It shall be the responsibility of the Managing Director to ensure that an adequate health record in respect of each employee is made and maintained and that that record or a copy is kept available in a suitable form for at least 40 years from the date of the last entry made in it. Employees may request or inspect copies of their own personal records at any reasonable time.

Where the blood-lead concentration for an employee equals or exceeds the appropriate action level, steps shall be taken to determine the reason or reasons for the high level of lead in blood and shall, so far as is reasonably practicable, introduce measures designed to reduce the blood-lead concentration of that employee to a level below the appropriate action level. In any case where the blood-lead concentration or urinary lead concentration of an employee reaches the appropriate suspension level, The Managing Director shall -

- ensure that an entry is made in the health record of the employee by the doctor certifying whether the employee should be suspended from working with lead and including the reasons.
- ensure that the company Doctor informs the employee accordingly and provides the employee with information and advice regarding further medical surveillance
- review the risk assessment and any current measure taking into account any advice given by the doctor.
- Review of the health of any other employee who has been similarly exposed, and instruct a medical examination if necessary.

Where the doctor has provided a professional opinion that employee should not be engaged in work which exposes them to lead or that the employee should only be engaged under conditions specified in the record, the employee shall not be permitted to carry out any work which exposes that employee to lead unless such work is approved the doctor.

It shall be the responsibility of all employees requested to undergo Medical or Biological surveillance to attend and comply with all medical surveillance procedures as may be required. Employees must provide all relevant information concerning their health as the doctor may reasonably require, inform the employer of any outcome and provide the company with all relevant results and reports. All surveillance shall be conducted during working hours and all costs in respect of surveillance including wages of the employee shall be borne by the company.

### **Information, instruction and training**

When undertaking work which is liable to expose an employee to lead the Managing Director shall be responsible for providing employees with suitable and sufficient information, instruction and training. Where necessary this shall be adapted to take account of significant changes in the type of work carried out or the methods of work used. In accordance with the Regulations, the training and information provided by Vacman Cleaning Ltd shall be appropriate to the level, type and duration of exposure identified by the risk assessment. Where appropriate this will include details of the form of lead to which the employee is liable to be exposed and -

- the risk which it presents to health,
- any relevant occupational exposure limit, action level and suspension level
- access to any relevant safety data sheet, and any other legislative provisions which concern the hazardous properties of that form of lead;
- Any significant findings of the risk assessment
- The appropriate precautions and actions to be taken by the employee in order to safeguard himself and other employees at the workplace
- The results of any monitoring of exposure to lead.

- The collective results of any medical surveillance will be provided in such a way as to prevent the results from being identified as relating to a particular person.

It shall be the responsibility of line Managers and Supervisors engaged in lead work to ensure that any person (whether or not an employee) who carries out work in connection with lead has suitable and sufficient information, instruction and training as laid out above. All employees are to read such information, comply with instructions and attend any relevant training courses.

#### **Arrangements to deal with accidents, incidents and emergencies**

Vacman Cleaning Ltd may prepare procedures which can be put into effect to deal with accidents emergencies and incidents where a prior assessment indicates that significant amounts of lead may be present. It shall be the responsibility of all employees follow these instructions.

Should such an event occur the Managing Director of Vacman Cleaning will ensure that -

- (i) details of relevant work hazards and hazard identification arrangements, and specific hazards likely to arise at the time of an accident, incident or emergency is available on site.
- (ii) suitable warning and other communication systems are in place to enable an appropriate response, including remedial actions and rescue operations, to be made immediately when such an event occurs.

This information will be made available to relevant accident and emergency services to enable those services, whether internal or external to the workplace, to prepare their own response procedures and precautionary measures; and will be displayed at the workplace if appropriate.

In the event of an accident, incident or emergency related to the presence of lead at the workplace immediate steps shall be taken to mitigate the effects of the event and restore the situation to normal.

It shall be the responsibility of Managers and Supervisors to ensure that procedures are in place to inform employees who may be affected and only those persons who are essential for the carrying out of repairs and other necessary work is permitted in the affected area. They shall be provided with appropriate personal protective equipment and any necessary specialised safety equipment to restore the situation to normal.

It is the policy of Vacman Cleaning Ltd to provide instant health and safety advice or guidance for employees. It is particularly important that all staff are aware of the requirement to stop work immediately if they are in any way unsure of how to complete a task safely. In the event that ANY employee requires information or guidance in relation to health and safety they should speak to their line manager, or telephone 0800 783 6103. It should be remembered by all employees that our consideration is not what health and safety costs. We consider what health and safety saves.

## APPENDIX A

### ACTIVITIES IN WHICH THE EMPLOYMENT OF YOUNG PERSONS AND WOMEN OF REPRODUCTIVE CAPACITY IS PROHIBITED

**1.** In lead smelting and refining processes -

- (a) work involving the handling, treatment, sintering, smelting or refining of ores or materials containing not less than 5 per cent lead; and
- (b) the cleaning of any place where any of the above processes are carried out.

**2.** In lead-acid battery manufacturing processes -

- (a) the manipulation of lead oxides;
- (b) mixing or pasting in connection with the manufacture or repair of lead-acid batteries;
- (c) the melting or casting of lead;
- (d) the trimming, abrading or cutting of pasted plates in connection with the manufacture or repair of lead-acid batteries; and
- (e) the cleaning of any place where any of the above processes are carried out.

**3.** In this Schedule, "lead oxides" means powdered lead oxides in the form of lead, lead monoxide, lead dioxide, red lead or any combination of lead used in oxide manufacture or lead-acid battery pasting processes.