

Company Directive

STANDARD TECHNIQUE: HS1M

Relating to Occupational Health Surveillance of WPD Staff

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Document Revision & Review Table		
Date	Comments	Author
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1.0 INTRODUCTION AND LEGISLATION

Occupational Health Surveillance is required, subject to risk assessment in a number of UK Regulations. The principle Regulations that apply in a foreseeable manner to WPD are as follows;

- 1.1 The Management of Health and Safety at Work Regulations 2006, Regulation 6 which states that

“Every employer shall ensure that his employees are provided with such health surveillance as is appropriate having regard to the risks to their health and safety which are identified by the assessment.”

- 1.2 The Control of Substances Hazardous to Health Regulations 2002, Regulation 11(1) which states that;

“Where it is appropriate for the protection of the health of his employees who are, or are liable to be, exposed to a substance hazardous to health, the employer shall ensure that such employees are under suitable health surveillance.”

- 1.3 The Control of Noise at Work Regulations 2005, Regulation 9(1) which states that;

“If (the) risk assessment indicates that there is a risk to the health of his employees who are, or are liable to be, exposed to noise, the employer shall ensure that such employees are placed under suitable health surveillance, which shall include testing of their hearing.”

- 1.4 The Control of Vibration at Work Regulations 2005, Regulation 7(1) which states that:

*“(1) If –
(a) (the) risk assessment indicates that there is a risk to the health of his employees who are, or are liable to be, exposed to vibration; or
(b) employees are likely to be exposed to vibration at or above an exposure action value, the employer shall ensure that such employees are placed under suitable health surveillance, where such surveillance is appropriate.”*

- 1.5 In accordance with these Regulations, risk assessments have been carried out on WPD activities on a long term on-going basis. These risk assessments have included quantitative testing of levels of exposure to safety risk factors such as vibration, iso-cyanate vapours, asbestos, noise etc. Wherever reasonably practical, higher risk equipment and substances have been replaced with alternatives which either remove the risk altogether or reduce it. In some cases it has not been reasonably practical to remove the risk altogether, so safe systems of work have been introduced which isolate the hazard from the user (e.g. sealed mixing of jointing resins).

- 1.6 These risk assessments and subsequent actions, together with analysis of historical sickness records indicates that the risk of injury to the health of WPD staff from hazards while working for WPD, such as noise, vibration, chemicals etc. is LOW. On this basis, occupational health surveillance has historically not been deemed necessary for WPD staff in the South West and Wales.
- 1.7 Prior to its acquisition by WPD, Central Networks provided Occupational Health Surveillance to its staff. This provision has continued to be delivered in WPD Midlands after acquisition
- 1.8 Analysis shows that other UK DNOs all operate a variety of systems of occupational health surveillance for their staff.
- 1.9 There have also been a small number of industrial illness affecting WPD staff which are believed to have resulted from activities undertaken while working for previous employers or while at work for WPD, or one of its predecessor companies (SWaLEC, SWEB, Hyder, Central Networks, MEB, EMEB etc.) on activities which are no longer undertaken by WPD.
- 1.10 WPD is committed to continuous improvement and adopting best practice in managing the health and safety of its staff, so in order to further reduce the risk of injury to the health of WPD staff, an occupational health surveillance system shall be operated across the whole of WPD.
- 1.11 The WPD Occupational Health Surveillance System shall be designed to:
- Increase higher risk members of staffs' awareness of health risks in the work environment.
 - Provide advice to members of staff about how to minimise the risks from noise, vibration, chemicals etc. to their health while at work.
 - Conduct suitable assessments to enable the early diagnosis of work related health problems. This early diagnosis will enable the effects of any work related health problems to be managed so that the effects are minimised.
 - Provide information to the Company about the effectiveness of WPD's safety control measures.

2.0 PRINCIPLES

- 2.1 The table shown in Appendix A shows the groups of staff for whom it is assessed that Occupational Health Surveillance is required.
- 2.2 All new employees shall be required to attend a medical assessment prior to employment by WPD.

- 2.3 All identified staff shall be required to attend a health surveillance session with a WPD appointed health professional at intervals not exceeding three years. In the event that the health professional considers that an individual's condition requires more frequent assessment this interval may be reduced.
- 2.4 Occupational Health surveillance shall be provided during work time at no expense to the employee.
- 2.5 Procedures conducted as part of Occupational Health Surveillance will, in the majority of cases, be limited to:
- Inspection of readily detectable conditions in conjunction with verbal enquiries about symptoms and examination by a qualified person i.e. A WPD appointed Occupational Health Nurse.

In cases where conditions which require further assessment or surveillance are discovered the following may also be required;

- Medical surveillance and clinical examination by a qualified medical practitioner.
- Biological monitoring e.g. measurement of workplace agents in blood, urine, excreta.
- Biological effect monitoring e.g. lung function testing, skin sensitivity etc.

3.0 INFORMATION AND RECORDS

- 3.1 Occupational health surveillance will inevitably involve a number of parties, e.g. safety professionals, WPD managers and employees etc. Everyone involved shall be aware of their personal responsibilities to maintain strict confidentiality of individual's medical and health records.
- 3.2 Personal health information derived from occupational health surveillance of specific employees shall not be disclosed to management without the employee's express written consent.
- 3.3 Group reports may be prepared and circulated as appropriate to assess the effectiveness of health and safety control measures, but these shall avoid any information that can lead to identification of any individual's personal or medical information.
- 3.4 Employees may request copies of any personal medical information that may be generated as part of the Health Surveillance process. This information shall be provided free of charge to the employee.
- 3.5 Individual health records shall be kept by WPD's appointed health surveillance provider and shall be retained for a minimum period of forty years.

- 3.6 Any occupational diseases detected during routine surveillance must be notified to the employer by the current Occupational Health Surveillance provider. Where appropriate this shall be investigated and reported to HSE as required by the RIDDOR Regulations 1995 and as detailed in ST:HS5H.

4.0 DUTIES AND RESPONSIBILITIES

4.1 EMPLOYEE RELATIONS

4.1.1 The Employee Relations Team shall be responsible for;

- Ensuring that an appropriately competent contractor is employed to provide Occupational Health Surveillance services as described in this document.
- Day to day management of the contract.
- Development of an annual programme which meets the aim described above.
- Provision of the annual programme and list of employees required to attend to local line managers.
- Liaison with the Occupational Health Surveillance provider's personnel.
- Production of Management Information about the Occupational Health Surveillance programme as required.
- Provide advice to employees and support to line managers when required about the Occupational Health Surveillance system.
- Budgeting for the costs of the Occupational Health Surveillance contractor, directly associated costs and any other costs that may arise as a result of additional requirements for medical tests or monitoring.
- Provision of a standard SAFIRE code on which employees will book their time.

4.2 LINE MANAGERS

4.2.1 Local Line Managers shall be responsible for;

- Ensuring the suitable facilities are made available locally as described in Section 5.
- Programming the employees for whom they are responsible to enable them to attend Occupational Health Surveillance sessions as required by the annual programme.

- Ensuring that time and expenses (if required) are allocated to the correct SAFIRE code.
- Advise Employee Relations of the names of staff that are not available to attend the sessions and provide reasons for their non-attendance.

4.3 SAFETY TEAM

4.3.1 The Safety Team shall be responsible for this Policy and shall assist and advise the Employee Relations Team and managers as required.

4.4 INDIVIDUAL EMPLOYEES

4.4.1 All employees have a general duty under the Health & Safety at Work etc. Act 1974 Section 7 to co-operate with their employers in health surveillance participation.

4.4.2 Co-operation by employees with the Company on matters of Health and Safety is reinforced in WPD's current Health and Safety Policy Statement.

4.4.3 Employees are therefore required to co-operate with the managers by attending Occupational Health Surveillance sessions as requested.



5.0 **FACILITIES**

5.1 In order for Occupational Health Surveillance visits to be conducted in a professional, confidential manner, the following facilities shall be made available at every WPD location where such visits are undertaken;

- A private room with a desk, two chairs, along with running hot and cold water within the room or at close proximity to the room being used.

APPENDIX A

LIST OF EMPLOYEE ROLES REQUIRING OCCUPATIONAL HEALTH SURVEILLANCE

Craft Apprentice

Craft Attendant

Craft: Civil, Fitting, Jointing, Overhead lines, Revenue Protection and Smart Metering

Helicopter Chief Engineer and Engineer

Helicopter Pilot and Observer

Installation Inspector

Network Specialist/Engineer

Operator: Civil, Fitting, Jointing or Overhead lines

Storekeeper

Technician - Fitting

Technician - O/H

Technician - U/G

Technician (Smart Metering)

Vehicle Mechanic

Workshop Controller

Any Network Services Staff whose job titles are not detailed above but who may be exposed to risks to their health through their participation in on-site field activities, on a regular planned or standby basis.

Note: Other employees may be included at the discretion of the local Distribution Manager and Employee Relations.

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APPENDIX B

SUPERSEDED DOCUMENTATION

None

APPENDIX C

ASSOCIATED DOCUMENTATION

POL:HS1 - Health and Safety Policy Statement
POL:HS2 - Noise and Vibration
POL:HS6 - COSHH

APPENDIX D

IMPACT ON COMPANY POLICY

This document introduces a new requirement for employees in defined roles to attend regular Occupational Health Surveillance assessments.

APPENDIX E

IMPLEMENTATION OF POLICY

The introduction of this ST has been subject to consultation at the Company and Local SHE Meetings.

S&T Manager and ER Rep have visited major locations to brief all Safety Reps and Line Managers for this new policy.

Employee Relations shall provide local line managers with an initial programme of Occupational Health Surveillance visits planned for the next twelve months along with a list of staff required to attend during each calendar year.

APPENDIX F

KEY WORDS

None