Mid Essex Hospital Services NHS
NHS Trust

Policy for Lead at Work	**Type: Policy** **Register No: 09084** **Status: Public**

Developed in response to:	Control of Lead at Work Regs
Contributes to CQC Outcome:	Regulation 15 – Premises and equipment

Consulted With	**Post/Committee/Group**	**Date**
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Author/Contact for Information	Ian Jackson, Principal Engineer
Policy to be followed by (target staff)	All staff
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Related Trust Policies (to be read in conjunction with)	Health & Safety Policy Risk Management Strategy & Policy Control of Contractors (Estates) Incident Policy

Document Review History

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1.0	Chris Churchouse	September 2009
2.0 Formal review	Ian Jackson	September 2011
3.0	Ian Jackson	September 2014
4.0	Ian Jackson	9th January 2018

Index

1. Purpose

1.1 The purpose of this policy is to ensure that:

- No work will be undertaken which is liable to expose any employees or others to exposure of lead unless an assessment of the risk to health created by that work has been carried out.
- Where assessment of the work concerned is likely to result in the exposure of any employees to lead as 'being significant' the measures needed to prevent or adequately control exposure shall be identified and implemented in accordance with the Control of Lead at Work Regulations 2002.
- Where assessment of the work concerned is likely to result in the exposure of any employees to lead as 'not being significant' the measures needed to prevent or adequately control exposure shall be identified and implemented in accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

2. Introduction

2.1 This policy has been devised to aid managers and heads of departments to meet statutory obligations.

2.2 The Trust attaches the greatest importance to the Health, Safety and Welfare of its employees, and in particular recognises the significance of the risks to health caused by exposure to lead, lead compounds, dust, fumes or vapour at work.

3. Scope

3.1. This policy is applicable to all staff and independent contractors working within the Trust.

4. Roles & Responsibilities

4.1 The **Chief Estates & Facilities Director** is the nominated Director with a responsibility for Health and Safety and will oversee how the policy is put into practice and meeting the aims set. In addition, the Chief Estates & Facilities Director is responsible for seeking sufficient resources to be made available, via the Investment Group, with the aim of ensuring that the duties outlined in this policy are carried out. In the event that sufficient resources are not available, prioritisation of allocation of expenditure will be agreed with the Investment Group.

4.2 The **Principal Engineer** is responsible for understanding-legislation relevant to this policy, identifying funds required to meet the requirements of the policy and ensuring all staff are trained in Health and Safety matters to level required to fulfil their duties efficiently.

4.3 Although an organisation-wide approach has been established, detailed arrangements for controlling risks to health of employees caused by exposure to lead remain the responsibility of **Directors, Heads of Departments and Managers**. All departmental Health and Safety Policies should deal with the risks arising in the course of the work of the department.

4.4 **Management / Supervisors** must ensure that steps are taken to implement the requirements of the Policy. They have a responsibility to:

- Identify hazards and ensure the process of risk avoidance, risk assessment and risk reduction, is implemented within their particular area of responsibility. They can nominate competent staff to assist in this process. Departments where work with lead takes place should carry out a risk assessment as required by the Management of Health and Safety at Work Regulations 1999.
- Ensure that all staff receive information, instruction, training and supervision in relation to working with lead and the precautions to be taken.
- Provide equipment and encourage the use of relevant equipment where provided, ensuring that there is a procedure in place for cleaning, and maintenance of all equipment in efficient working order.
- Inform the employee if exposure to lead is likely to be 'significant', and where specific requirements of the Regulations will be triggered, i.e. the need:

  (a) To provide employees with protective clothing;
  (b) To monitor lead-in-air concentrations;
  (c) To place the employees concerned under medical surveillance.

- Follow up all accidents, incidents, near misses associated with exposure to lead, investigate their cause and to review control measures.
- Maintain records of incidents, and maintenance for individual employees.
- Monitor trends of sickness absence related to risks in exposure to lead.
- Employers must report to the enforcing authority, any case of lead poisoning occurring amongst their workforce. The Trust Incident Reporting Policy should be used, and the Trust will be required to make reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

5. Operational System Procedures

5.1 Outline of the Regulations

A diagrammatic presentation of the main provisions of the Regulations is shown in Appendix 1.

5.2 Types of lead work liable to result in significant exposure

5.2.1 Some work with lead is liable to result in significant exposure. However, occasional or small-scale activity in the industries and processes concerned may not give significant exposure: the duration, scale and adequacy of the measures to control exposure all have to be considered. Table 1 below gives some examples of such work and the sort of industries and processes where significant exposure could be found.

Table 1 Work with lead liable to result in significant exposure	
Lead work where there is liable to be significant exposure to lead (unless the employer provides adequate controls)	*Examples of industries and processes where such work could be carried out:*
Lead dust and fumes	
1 High-temperature lead work (above 500°C), e.g. lead smelting, melting, refining, casting and recovery processes, lead burning, welding and cutting.	Lead smelting and refining; casting of certain non-ferrous metals, e.g. gun-metal; battery grids; leaded steels manufacture; scrap metal and wire-patenting processes, burning of lead-coated and painted plant and surfaces in demolition work; ship-building, breaking and repairing; chemical industry; radiator repair.
2 Work with lead compounds which gives rise to lead dust in air, e.g. any work activity involving a wide variety of lead compounds.	Manufacture of lead-acid batteries, paints and colours, lead compounds, rubber products; Fire assay, i.e. the use of lead oxides for the assay of precious metals by the process of cupellation; certain mixing and melting processes in the glass industry, certain colour preparations and glazing processes in the pottery industry. High-speed mixing and blending of plastics moulding powders containing lead stabilisers or colours. Work with low-solubility lead compounds where poor working practices and standards of cleaning exist (see item 5). Battery Breaking
3 Abrasion of lead giving rise to lead dust in air, e.g. dry discing, grinding, cutting by power tools.	Miscellaneous industries, e.g. motor vehicle body manufacture and repair of leaded car bodies. Blast removal and burning of old lead paint.
4 Spraying of lead paint and lead compounds and low-solubility lead compounds.	Painting bridges, buildings etc. with lead paint.
5 Work with low-solubility inorganic lead compounds.	Work which is poorly controlled. This might be because of poor ventilation, housekeeping, personal hygiene or lack of proper welfare, eating, drinking or smoking facilities.
6 Paint stripping.	Furniture and joinery restoration, e.g. removal of old lead paint from antique furniture, doors, window frames etc. by immersion in a bath of caustic soda or dichloromethane, and scraping off the residual sludge. May be followed by pressure washing and sanding.
7 Craft work.	Sculpture of bas relief in lead sheet.
Lead alkyls	
1 Production of concentrated lead alkyls.	Lead alkyl manufacture.
2 Inspection, cleaning and maintenance work inside tanks which have contained leaded gasoline, e.g. road, rail and sea tankers and fixed storage tanks.	Oil refineries, oil transport terminals and certain works where tank cars are inspected or repaired.

5.3 Types of lead work not liable to result in significant exposure

5.3.1 Some work with lead is not liable to result in significant exposure unless the lead content and/or character of the lead is changed by the work itself, e.g. where, although the lead content is low and in a finely divided state, it may be concentrated during processing. Table 2 below gives some examples of such work and the sort of industries and processes where it could be found.

Table 2 Work with lead not liable to result in significant exposure

Lead work where there is not liable to be significant exposure to lead	*Examples of industries and processes where such work could be carried out*
Lead dust and fumes	
1 Work with galena (lead sulphide).	Mining and working of galena when its character or composition is not changed.
2 Low-temperature melting of lead (below 500°C). (Such low temperatures control the fume but some care is still required in controlling any dust from dross.)	Plumbing; soldering.
3 Work with materials which contain less than 1% total lead.	
4 Work with lead in emulsion or paste form where the moisture content is such and is maintained so that lead dust and fume cannot be given off throughout the duration of the work.	Brush painting with lead paint and using some stabilisers for plastics.
5 Handling of clean solid metallic lead, e.g. ingots, pipes, sheets etc.	Miscellaneous metal industries, stockholding, general plumbing with sheet lead.
Lead alkyls	
1 Any exposure to lead alkyl vapours from leaded gasoline where the lead content is limited under the Motor Fuel (Composition and Content) Regulations 1994 (SI No 2295)	Work with such leaded gasoline including, for example, the filling of petrol vehicles on garage forecourts

5.4 Developing a Safe System of Work

5.4.1 Information gathered during the risk assessment will be used to develop a written safe system of work document when the hazards cannot be physically eliminated and some element of risk remains. This document will give information and instruction to the employees who are to carry out the work including safe means of access and egress.

5.4.2 This will include all the information and training needed to work safely with lead, including what to do in an emergency. How the employee should make full use of all the control measures, systems of work and equipment which is provided and the instructions to follow, including those for using the equipment.

5.5 Adequate Control of Exposure

5.5.1 The measures used to control exposure to lead where prevention is not reasonably practicable should include where appropriate one or more of the following:

- Using substitute lead-free material or low solubility lead compounds;
- Using lead or lead compounds in emulsion or in paste form to prevent or minimise the formation of dust;
- Using temperature controls to keep the temperature of molten lead to below 500 deg/C (the temperature at which fume emissions become 'significant'), though the formation of lead oxide and the emission of lead dust may still be a problem below this temperature;
- Containment of lead, lead material, compounds, fume or dust in totally enclosed plant and in containers such as drums and bags;
- If total enclosure is not reasonably practicable, use of effective exhaust ventilation system;
- Wet methods of treatment;
- Providing and maintaining a high standard of cleanliness;
- Methods for safe handling, storage and transport of lead, and of waste containing lead, at the workplace;
- Appropriate hygiene measures including adequate washing facilities;
- Where the exposure to lead is, or is liable to be significant, suitable and sufficient protective clothing will be provided;
- Where there is exposure to lead, control of that exposure shall, so far as the inhalation of lead is concerned, only be treated as being adequate if;

    a) The occupational exposure limit for lead is not exceeded; or
    b) Where that occupational exposure limit is exceeded, the employer identifies the reasons for the limit being exceeded and takes immediate steps to remedy the situation.

5.6 Working Facilities, General Hygiene and Infection Prevention

5.6.1 For work involving exposure to lead, washing facilities should allow employees to meet high standards of personal hygiene so as to minimise the risk of ingesting or otherwise absorbing lead.

5.6.2 To further reduce the risk of ingestion of lead employees must not eat or drink in places which are contaminated or likely to be contaminated by lead arising from work activities.

5.6.3 Employees must be informed of the reasons why washing is required before eating or drinking and why eating and drinking are not allowed in contaminated work places.

5.6.4 This is expected to be undertaken by the individual user departments using the Trust Event Reporting Form in accordance with the Trust Risk Policy.

6. Monitoring

6.1 The Estates Department will keep sufficient records to identify where lead is present and where works have been undertaken through reference to proactive risk assessment and annual reviews.

6.2 An annual audit of this policy will be undertaken and results submitted to the Health & Safety Group for scrutiny. This will include details of any incidents reported via the Trusts incident reporting process (DATIX).

7. Training

7.1 Training will be required for all employees required to work with lead or lead based compounds.

7.2 Training will be required for all employees responsible for assessing and controlling working with lead.

7.3 Training will be provided to enable employees to be competent and confident with procedures, legislation and equipment associated with control of lead at work.

8. Communication & Implementation

8.1 The policy will be made available on the Trust's intranet & website by the Estates Department.

8.2 The Head of Maintenance will be responsible for ensuring all Estates staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.

8.3 The PFI (Bouygues) Estate Manager will be responsible for ensuring all Estate staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.

8.4 The PFI (Braintree Community Hospital (BCH) Estate Manager will be responsible for ensuring all Estate staff read and fully understand the policy and is read in conjunction with the Control of Contractors Policy.

8.5 The approved policy will be notified in the Trust's Staff Focus that is sent via e-mail to all staff.

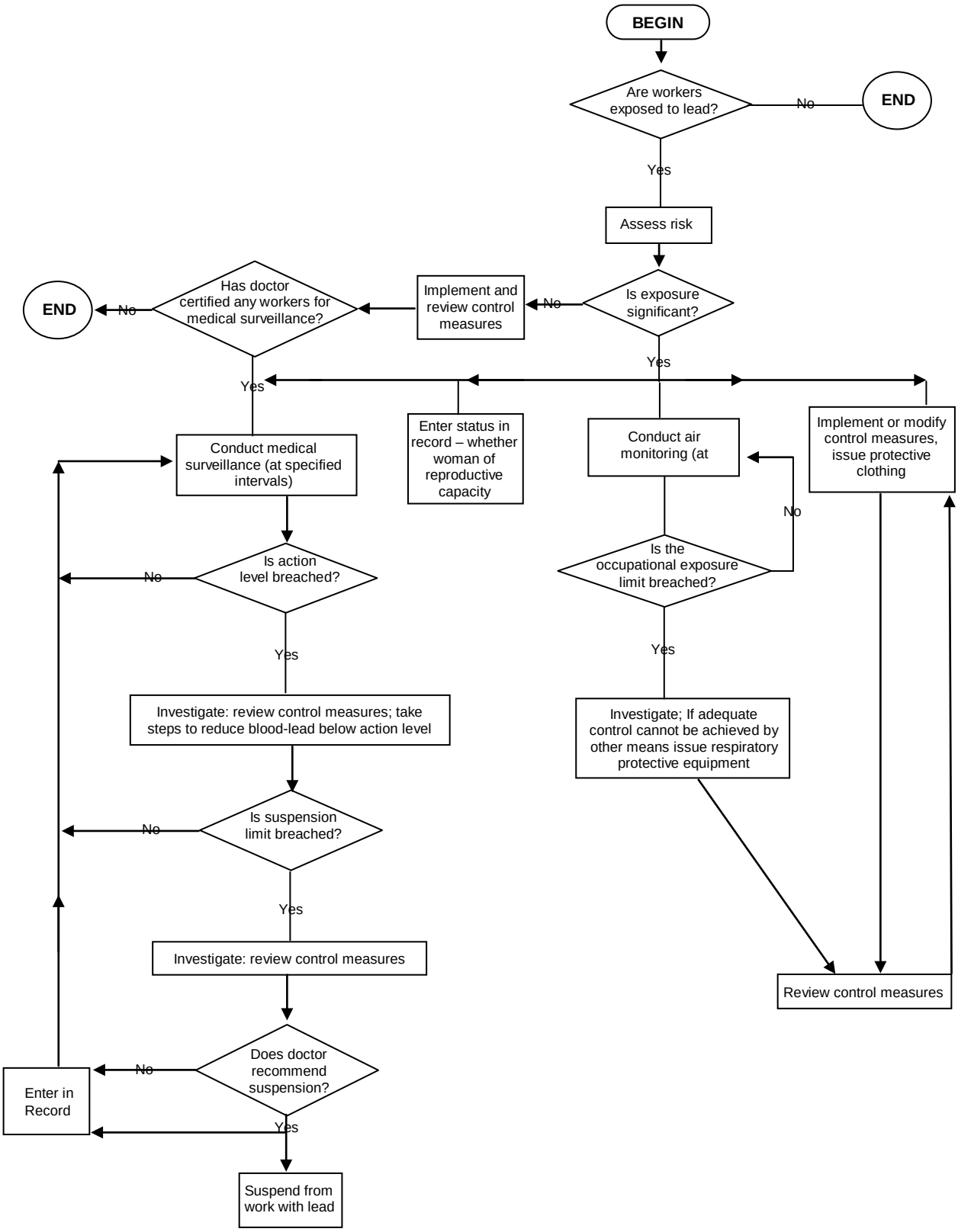
9. Equality & Diversity

9.1 The Trust is committed to the provision of a service that is fair, accessible and meets the needs of all individuals.

10. References

- The Workplace (Health, Safety and Welfare) Regulations 1992. Approved Code of Practice and guidance L24 HSE
- The Management of Health and Safety at Work Regulations 1999. Approved Code of Practice and guidance L21 HSE
- The Control of Substances Hazardous to Health Regulations 2002. Approved Code of Practice and guidance L5 (Sixth edition) HSE
- Lead and you: A guide to working safely with lead Leaflet INDG3O5(rev2) HSE

Figure 1: Outline of the Control of Lead at Work



Note: the Regulations also require that, in certain circumstances employers prepare procedures which they can put into effect to deal with accidents, incidents and emergencies related to the presence of lead at the workplace.