Wet Workers

‘Wet-work’ describes prolonged or frequent skin contact with water, (e.g. water/chemical mixtures, wet food) usually for two or more hours a day or more than 20 hand washes. Wet-work tasks include washing up, washing food, general cleaning, or frequent hand washing.

HSE currently state that “Almost all workers in wet-working jobs develop some degree of dermatitis”.

The Legislative Framework

Legislation related to chemical and biological hazards includes:

- Health and Safety at Work Act (1974)
- Management of Health and Safety at Work Regulations (1999)
- Control of Substances Hazardous to Health (COSHH) Regulations (1999)
- Chemical (Hazard, Information & Packaging for Supply) Regulations (1994) - CHIP
- Food Safety Act (1990)
- Food Safety (General Food Hygiene) Regulations (1995)
- Reporting of Injuries, Diseases & Dangerous Occurrence Regulations (RIDDOR) (1995)
- Data Protection Act (1998)

Requirements of the Regulations

Refer to current Health Surveillance policy (link attached)

http://www.gla.ac.uk/services/occupationalhealthunit/staff/healthsurveillance/

Keeping Health Records
(These are separate records from the Occupational Health notes and should be kept securely by the employer or line manager)

It is a good idea to have an agreed health assessment form to support a consistent approach. Employers and staff must make sure that all information is recorded in an accurate and timely way. All written records should be legible, signed and dated.

Under the regulations, employers must be able to produce the following records:

- The assessments of risks to health caused by exposure. This should include a list of hazardous substances, the control measures provided and the training provided for staff.

- The examination, testing and maintenance of control measures. Employers must keep these records for at least five years.

- Records of monitoring environmental exposure. Employers must keep these for at least five years.

- Employers should keep records of individual dosimetry monitoring and health surveillance for staff for at least 40 years from the date of last entry.
Monitoring and Review

All procedures should give details of the method of the review and how often it is carried out. Employers must review assessments, in particular when there is reason to think they are no longer valid or there has been a significant change in the work to which the assessment relates.

Employees identified with skin problems following routine inspection should be referred to the Occupational Health Unit for further examination.

Communication

At induction and during employment all staff should know about the measures in place to protect them from chemical and biological hazards relevant to their roles. Employers should update this information regularly. Staff should have access to copies of all COSHH risk assessments which are relevant to their area of work.

Training

Procedures should be in place to make sure that assessors are given enough training to carry out their roles.

Employers should also provide information, instruction and training to staff on:

- The risks to health created by being exposed to the substances they are working with; and
- The measures in place to control the risk and their own responsibilities.

It is particularly important that employers provide this information at induction and regularly after this, and also when any change is made to working practice or the working environment.

See attached link for guidance:
http://www.hse.gov.uk/skin/professional/trainingresources.htm

Health Surveillance

Health surveillance is appropriate when staff are exposed to substances in circumstances where:

- An identifiable disease or negative health effect may be related to the exposure;
- There is a reasonable likelihood that the disease or negative effect may occur under the particular conditions of the work;
- Valid techniques exist for detecting disease or effect.

Employers must keep staff health records for 40 years from the last date of entry. On receiving reasonable notice, any staff member must be allowed access to any health record which relates to them.
APPENDIX 1

COSHH HEALTH RECORD FORM - RECORD OF HAZARDOUS SUBSTANCE USAGE

The COSHH Regulations require all individuals working with substances that can cause certain identifiable diseases or adverse health effects to be kept under health surveillance.

For most workers this is confined to maintaining a record of a person’s involvement in such work. Individuals who work with respiratory sensitisers, mercury, latex, arsenic and skin sensitisers will have additional health surveillance arranged by the Occupational Health Service.

As a precautionary measure the University also requires the health surveillance for all individuals classed as wet-workers or working with Nanoparticles. Therefore all persons working within these groups should use this health record form and register with the University’s occupational Health Service.

For further information on the criteria for health surveillance see the University’s Hazardous Substances Policy.

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<th>Personal Details</th>
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<td>N.I. Number:</td>
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<td>Department:</td>
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<tr>
<td>Name of Supervisor and contact number:</td>
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<td>Signed:</td>
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PLEASE COMPLETE SUBSTANCE DETAILS OVERLEAF

Once completed please hand a copy to your Departmental Administrator or your Line manager annually.

THIS RECORD MUST BE KEPT BY THE DEPARTMENT FOR 40 YEARS AFTER THE PERSON HAS LEFT THE UNIVERSITY
<table>
<thead>
<tr>
<th>Name of substance</th>
<th>Nature of hazard(^1)</th>
<th>Physical State (^2)</th>
<th>Quantity/amount(^3)</th>
<th>Frequency/duration of use(^4)</th>
<th>Control measures in use(^5)</th>
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\(^1\) Carcinogen, mutagen, substance toxic to reproduction, respiratory sensitiser (i.e. asthmagen), skin sensitiser, (Relevant Risk Phrases/Hazard statements R42/H334,R43/H317,R45/H350,R46/H340,R49/H350i,R60/H360f,R61/H360d,R64/H362 where listed)

\(^2\) Liquid, solid, dust, vapor, gas or nanoparticles (particles of approximately 100nm or less in at least one dimension)

\(^3\) Include amounts and units

\(^4\) Daily, weekly, monthly, rarely

\(^5\) Fume cupboard, Laminar flow bench, local exhaust ventilation (LEV), glove box or other form of containment, personal protective equipment (please specify)

**INSPECTION DETAILS**

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