



Health Surveillance Policy

Introduction

The objectives of health surveillance are: -

- (a) Protect the health of individuals by detecting as early as possible, diseases or adverse health effects which may be work-related, eg exposure to hazardous substances, including biological agents, and physical agents.
- (b) Assist in evaluating the effectiveness of existing risk management measures and identify where any further action may be necessary.
- (c) Obtain, use, keep up to date and retain data and information for determining and evaluating risks to health.

Legislative Requirements for Health Surveillance

Regulations that specifically identify health surveillance and the situations where such surveillance is deemed appropriate that are most relevant to the University's areas of work and activities can be found in Appendix 1 of this policy.

Other current regulations that specifically identify health surveillance are

- The Control of Asbestos at Work Regulations; and
- The Control of Lead at Work Regulations;

Health Surveillance Responsibilities

Heads of Schools and Directors of Support Services have overall responsibility for ensuring local arrangements are in place that:

- (a) Ensure appropriate risk assessments take account of health surveillance requirements.
- (b) Identify and inform staff groups for whom health surveillance is required.
- (c) Ensure liaison with the Occupational Health Unit to assist in identifying where health surveillance requirements are necessary or have been identified.
- (d) Immediately advise the Occupational Health Unit of any event resulting in the accidental release of, or exposure to, substances hazardous to health.
- (e) Ensure those with the responsibility for carrying out risk assessments are fully aware of health surveillance requirements and the arrangements to follow where a need, or potential need, is identified.
- (f) Ensure staff requiring health surveillance are able to attend the health surveillance programmes.
- (g) Ensure adequate and up to date records are maintained.

Occupational Health Unit

The Occupational Health Unit is responsible for: -

- (a) Advising and assisting managers, following the risk assessment, to incorporate suitable health surveillance requirements, including on an individual's commencement of employment or assignment to a particular activity.
- (b) Working with managers and others to advise on adjustments and modifications to the work of individuals aimed at protection of health.
- (c) The review of intervals for health surveillance following any untoward occurrence within the University working environment.

- (d) Maintaining awareness of health and safety legislation, guidelines and evidence for health surveillance programmes, and advising the University of any changes.
- (e) The Occupational Health Manager is responsible for supervising and checking the competency of staff delivering health surveillance programmes. The Occupational Health Advisers will deliver these programmes on behalf of the Occupational Health Manager and will:
 - i) Coordinate and assist in the delivery of timely and relevant health surveillance programmes, at times and locations to suit best the needs of services requiring them.
 - ii) Identify staff that may be at risk of work related ill health on the basis of pre-employment health declarations.
 - iii) Advise managers and subjects of health surveillance regarding outcomes, fitness for work status and any recommended restrictions in work practice.
 - iv) Liaise with and provide information to general practitioners and other specialists regarding adverse outcomes of health surveillance.
 - v) Identify complex cases where referral to The Occupational Health Physician or other relevant specialist is necessary to underpin advice to management.
 - vi) Advise relevant personnel of any health surveillance subjects failing to attend programmes.
 - vii) Maintain health surveillance records in accordance with current legislation and guidelines.
 - viii) Advise relevant personnel regarding record keeping to meet statutory requirements and satisfy external agencies.
 - ix) Report the relevant outcomes of health surveillance programmes to the appropriate personnel within the University Health and Safety Committee.

Individuals Undergoing Health Surveillance

Those undergoing health surveillance are responsible for: -

- (a) Advising the Occupational Health Unit of any significant health issues.
- (b) Reporting any significant changes in their health to the Occupational Health Unit in intervals between health surveillance sessions.
- (c) Cooperating with health surveillance programmes and other risk reduction measures for the protection of their health.

Access to Health Surveillance Information and Records

Following a particular aspect of an individual's health surveillance programme, the Occupational Health Adviser will bring the findings to the attention of the individual and discuss any implications as a result.

The Occupational Health Unit will bring to the attention of an individual's line manager the relevant findings of a health surveillance programme. Such findings could include:

- (a) Exposure to hazardous substances, physical agents etc indicating a risk to the individual's health.
- (b) Indication of the non-performance or under performance of risk control measures.
- (c) Whether the individual is deemed fit to undertake a particular work activity.
- (d) Individuals who are subject to health surveillance are entitled to access the records held in respect of that health surveillance, and can be routinely supplied with a copy of the examination outcome at the time it is carried out..
- (e) Requests for access to an individual's health records by any third party must be in writing and be accompanied by the individual's written consent to access these records.
- (f) Where a request is made by the Health and Safety Executive to the University to provide access to an individual's health record, that request must be in writing and the information will be restricted to that given by the relevant regulations and/or accompanying approved code of practice.

Maintenance and Retention of Health Surveillance Records

- a) Individual's health surveillance records will be maintained and retained in accordance with the prescribed periods given by the regulations under which that health surveillance has been carried out. These periods can be found in Appendix 1 to this policy.
- b) Where no prescribed period is given in respect of health surveillance carried out as required by specific legislation, the records for that health surveillance will be retained in accordance with Appendix 1.
- c) Individuals health surveillance records will be held securely and confidentially by the Occupational Health Unit

Appendix 1: Legislative Requirements for Health Surveillance

The Management of Health and Safety at Work Regulations		
What the Regulations Require	Application of the Regulations Requirements	Retention of Health Surveillance Records
<p><u>Regulation 6</u></p> <p>Employers are required to ensure employees are provided with appropriate health surveillance in relation to risks to health and safety identified by risk assessments carried out in accordance with the Regulations.</p>	<p>Risk assessments carried out under the Regulations will identify circumstances where health surveillance is required by specific health and safety regulations, eg Control of Substance Hazardous to Health Regulations (COSHH).</p> <p>In addition, health surveillance will be appropriate where risk assessments identify the following criteria:</p> <ol style="list-style-type: none"> a) There is an identifiable disease or adverse health effect related to employees' work; b) Valid techniques are available to detect indications of the disease or health effect; c) There is reasonable likelihood the disease or health effect may occur under particular conditions of the work; and d) The surveillance is likely to further protection of the health and safety of the employees it will cover, eg maintaining the effectiveness of a risk assessment and the controls implemented as a result. 	<p>There is no prescribed time period for the retention of records of health surveillance carried out under the Regulations.</p> <p>Good practice is to retain an individual's health surveillance record whilst they remain an employee and, once an individual's employment has ceased, whilst enquiries could still be made.</p> <p>Any records of health surveillance carried out under the Regulations will be retained in the University's Archives for at least 40 years after the date of last entry</p>

The Control of Vibration at Work Regulations		
What the Regulations Require	Application of the Regulations Requirements	Retention of Health Surveillance Records
<p><u>Regulation 7</u></p> <p>Employees shall be subject to suitable health surveillance if a risk assessment, carried out in accordance with the Regulations indicates:</p> <p>a) A risk to the health of employees exposed, or liable to be exposed, to vibration; or</p> <p>b) Employees are likely to be exposed to vibration at or above an exposure action value.</p> <p>Suitable health surveillance is considered appropriate where exposure to vibration is such that:</p> <p>i. A link can be established between the exposure and an identifiable disease or adverse health effect;</p> <p>ii. The disease or health effect may occur under the circumstances of the employee's work; and</p> <p>iii. There are valid detection techniques for the disease or health effect.</p>	<p><u>Hand-arm Vibration Syndrome</u></p> <p>Health surveillance should be provided for vibration-exposed employees, ie those undertaking activities involving the use of hand-held vibrating tools where:</p> <p>Exposure is likely to be regularly above the action value of 2.5m/s^2 A(8) as given by the Regulations;</p> <p>Exposure is likely to be occasionally above the action value and the risk assessment identifies the frequency and severity of exposure may pose a risk to health; and</p> <p>Employees are identified as particularly sensitive to vibration, eg previously diagnosed as suffering from hand-arm vibration syndrome.</p> <p><u>Whole Body Vibration</u></p> <p>Guidance accompanying the Regulations identifies health surveillance as not appropriate. There are no methods that exist for the detection, or indicate the early onset, of adverse health effects associated with whole body vibration, ie, lower back pain, that are specifically related to work.</p> <p>Whilst formal health surveillance is not identified as required, the guidance that accompanies the Regulations suggests an approach of reporting and monitoring the symptoms of lower back pain to assist in assessing the need for action on whole body vibration. This 'health monitoring' approach is not a legal requirement under the Regulations</p>	<p>There is no prescribed time period for the retention of records of health surveillance carried out under the Regulations.</p> <p>Good practice is to retain an individual's health surveillance record whilst they remain an employee and, once an individual's employment has ceased, whilst enquiries could still be made</p> <p>Any records of health surveillance carried out under the Regulations will be retained in the University's Archives for at least 40 years after the date of last entry.</p>

The Control of Noise at Work Regulations		
What the Regulations Require	Application of the Regulations Requirements	Retention of Health Surveillance Records
<p><u>Regulation 9</u></p> <p>If a risk assessment carried out in accordance with the Regulations identifies employees are, or likely to be, exposed to noise levels presenting a risk to health, those employees shall be subject to suitable health surveillance.</p> <p>Where health surveillance identifies hearing damage and, in the opinion of the doctor who the affected employee is referred to, this damage is likely to have resulted from exposure to noise:</p> <p>a) the affected employee shall be subject to continued health surveillance; and</p> <p>b) A review of the health of any other employee who has been similarly exposed is undertaken.</p>	<p>The Regulations give both lower and upper action values. These values are:</p> <p><u>Lower Action Values</u></p> <ul style="list-style-type: none"> • 80dB average daily or weekly exposure; and • 135dB peak single exposure. <p><u>Upper Action Values</u></p> <ul style="list-style-type: none"> • 85dB average daily or weekly exposure; and • 137dB peak single exposure. <p>Health surveillance will be required where employees are regularly exposed above the upper action values.</p> <p>Where an employee is regularly exposed between the lower and upper action values or occasionally above the upper action value, health surveillance should be provided if the particular employee is sensitive to noise, eg through previous exposures.</p>	<p>There is no prescribed time period for the retention of records of health surveillance carried out under the Regulations.</p> <p>Good practice is to retain an individual's health surveillance record whilst they remain an employee and, once an individual's employment has ceased, whilst enquiries could still be made.</p> <p>Any records of health surveillance carried out under the Regulations will be retained in the University's Archives for at least 40 years after the date of last entry.</p>

The Control of Substances Hazardous to Health Regulations		
What the Regulations Require	Application of the Regulations Requirements	Retention of Health Surveillance Records
<p><u>Regulation 11</u></p> <p>Where it is appropriate for the protection of the health of employees who are, or liable to be, exposed to hazardous substances, those employees will be under suitable health surveillance.</p> <p>Health surveillance is appropriate where:</p> <p>a) Exposure is to a substance, or engagement in a process specified in COSHH to the Regulations and there is a reasonable likelihood that an identifiable disease will result.</p> <p>Health surveillance in these circumstances will include medical surveillance under the supervision of a relevant doctor at intervals not exceeding 12 months, or more frequent if the doctor requires. In addition, where the doctor has certified:</p> <p>i. An employee should not be engaged in work that results in exposure to a specified substance, or specifies specific conditions whilst carrying out that work, those conditions must be complied with until the doctor indicates otherwise; and</p> <p>ii. Medical surveillance should be continued after exposure to a specified substance has ceased, that medical surveillance must continue whilst the employee is still employed until the doctor indicates otherwise.</p>	<p>In addition to the specific conditions given by the Regulations in relation to substances and activities given in Schedule 6 to the Regulations, examples of where health surveillance would be appropriate under the other criteria given in regulation 11 would include: -</p> <p>a) Exposure to substances having recognised adverse health effects on other parts of the body, eg mutagens, carcinogens, biological agents and micro-organisms, from where they enter, ie, by inhalation, ingestion, skin absorption or skin puncture;</p> <p>b) Substances known to be respiratory sensitisers, cause occupational asthma; and</p> <p>c) Substances known to be skin sensitisers, cause severe dermatitis.</p> <p>Valid health surveillance techniques need to be sufficiently sensitive and specific to detect the disease or health effect related to the type and level of exposure concerned. However, the techniques should not be carried out where there is a risk of the employee's health being harmed.</p>	<p>The Regulations require that each employee is subject to health surveillance; the records of that health surveillance shall be maintained and retained in the University's Archives for at least 40 years from the date of last entry.</p>

The Control of Substances Hazardous to Health Regulations (continued)

Regulation 11 (continued)

- b) An employee's exposure to a hazardous substance is such that:
- i. An identifiable disease or adverse health effect may result;
 - ii. There is a reasonable likelihood the disease or health effect may occur under the particular conditions of the employee's work; and
 - iii. There are valid techniques to detect the indications of the disease or health effect, and these techniques are of low risk to the employee.

The Ionising Radiation Regulations		
What the Regulations Require	Application of the Regulations Requirements	Retention of Health Surveillance Records
<p>Regulation 24</p> <p>1) This regulation shall apply in relation to:-</p> <p>(a) Classified persons and persons whom an employer intends to designate as classified persons</p> <p>(b) Employees who have received an overexposure</p> <p>(a)classified persons and persons whom an employer intends to designate as classified persons;</p> <p>(b)employees who have received an overexposure and are not classified persons;</p> <p>(c)employees who are engaged in work with ionising radiation subject to conditions imposed by an Appointed Doctor or Employment Medical Adviser under paragraph (6).</p> <p>2) The employer shall ensure that each employee to whom this regulation relates is under adequate medical surveillance by an Appointed Doctor or Employment Medical Adviser for the purpose of determining the fitness of each employee for the work with ionising radiation which they are to carry out.</p>	<p>Employees are required to be under medical surveillance by an 'Appointed Doctor' (AD) or Employment Medical Adviser (EMA) (at University of Glasgow this will be the Consultant OH Physician)</p> <p>The employer will create a health record for each classified person (and others to whom this Regulation applies) and retain this for at least 50 years from the date of the last entry.</p> <p>Adequate medical surveillance should include:</p> <p>(a) a medical examination before first being designated as a classified person in a post involving work with ionising radiations</p> <p>(b) periodic reviews of health at least once every year;</p> <p>(c) special medical surveillance of an employee when a relevant dose limit has been exceeded;</p> <p>(d) determining whether specific conditions are necessary;</p> <p>(e) a review of health after cessation of work where this is necessary to safeguard the health of the individual.</p>	<p>The OHU will maintain the medical record for each classified person.</p> <p>Records of Health Surveillance carried out under IRR regulations will be retained in the University's Archives for 50 years from the date of last entry in the record.</p>

The Ionising Radiation Regulations (Continued)

What the Regulations Require	Application of the Regulations Requirements	Retention of Health Surveillance Records
	<p>It is the duty of employees to make themselves available for medical surveillance during working hours, if required by the employer, and to provide the Doctor with such health information as they may require.</p> <p>Female employees must notify their employer as soon as possible if they become pregnant or if they are breast feeding</p> <p>The dosimetry record and the absence record for the previous 12 months must be provided to the OH Physician at the time of the medical examination</p> <p>The Doctor may certify that in their professional opinion the employee concerned should not be engaged in work with radiation or that work should continue only in accordance with conditions specified by the Doctor.</p> <p>Where an employee is aggrieved by a decision recorded in the health record they may apply to the HSE for a review of that decision provided the application is made within 3 months of the date on which they were notified of the decision.</p>	

Appendix 2: Examples of Types of Health Surveillance available at the University of Glasgow Occupational Health Unit

The Management of Health and Safety at Work Regulations	
Risk Item	Type of Appropriate Health Surveillance
Noise levels presenting a risk to health	Enquiry about symptoms, inspection of ears, audiometry
Chemicals/substances causing skin irritation (chronic toxins, potent steroids, cytotoxic drugs, toxic pesticides)	Enquiry about symptoms, inspection and examination
Vibrating machinery/equipment	Enquiry about symptoms, inspection and examination
Ionising Radiation	Enquiry about symptoms, medical examination, blood tests
Non-Ionising (laser) class 3R, 3B and 4 laser	Specific laser vision screens by appointed optometrist
Respiratory Sensitisers (Lab animals, wood dust, agricultural grains and dust, latex, formaldehyde)	Enquiry about symptoms, lung function test
<u>Other</u>	
Fork-lift truck drivers. Group 2 licence (PSV, LGV & HGV drivers)	Medical examination and eyesight testing
Night-worker assessments (voluntary)	Enquiry about symptoms, medical examination
Employees who work at heights	Enquiry about symptoms, medical examination