



Employee Health Supervision Policy

1. Introduction

This document sets out xxxxx policy on the arrangements for health surveillance and screening as set out and administered by Occupational Health. It deals with the circumstances in which health surveillance is appropriate, how it is performed and the responsibilities of those involved. The individual elements of the policy are determined by statute (e.g. Health and Safety at Work Act or Food Safety Act and other codes of practice) or commercial (e.g. customer or employers liability) requirements.

Health surveillance, screening and assessment will be undertaken and supervised by Occupational Health following best practice guidelines and based on the type of health risks encountered on each xxxx site

2. Aims

- To ensure that new recruits and employees are fit to perform their jobs
- To maintain health standards
- To ensure that the health of employees is not negatively affected by working for xxxx
- To protect the integrity of the product where this may be compromised by employee illness
- To protect the safety of others

3. Application

This policy will apply to all employees

4. Legal and Other

Control of Noise at Work Regulations
Control of Substances Hazardous to Health Regulations
Management of Health and Safety at Work
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
Health Surveillance at Work HSG 61
Working Time Regulations

5. Policy Detail

5.1 Responsibilities

- **Management** will identify employees who require supervision of health, whether by surveillance, screening, testing or via management referral processes, according to the particular needs of the business and based on

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risk assessment of the job undertaken by a particular individual or groups of workers

- **Management** will take any necessary action following the receipt of advice from Occupational Health on employee fitness.
- **HR** will keep individual and group records of health surveillance and screening results for inspection by HSE, and ensure that health surveillance is conducted in a timely manner
- **Health and Safety** will undertake periodic risk assessments required under legislation eg Control of Noise at Work, Control of Substances Hazardous to Health and after an adverse health incident is reported via Occupational Health
- **Employees** to attend or participate in health surveillance or health monitoring programmes.
- **Occupational Health and Wellbeing** to:
 - Recommend and supervise the application of medical interventions and best practice for complying with health surveillance and health screening requirements under legislation
 - Undertake health screening and surveillance of employees based on risk assessment
 - Advise management concerning employee fitness, within the constraints of medical ethics.

5.2 Health Surveillance

Health surveillance is a legal term to describe health supervision and monitoring under specific legislation such as the Control of Substances Hazardous to Health Regulations, the Control of Noise at Work Regulations and the Management of Health and Safety at Work Regulations.

The programme will normally consist of pre-exposure baseline screening by inspection or enquiring into current health, regular health checks and the keeping of health records on individuals. Any negative effects will be recorded and reported back to Management for action to prevent further harm to either the individual or groups undertaking the same work.

In cases where work related ill health is suspected employees will be asked to attend for further testing outside of the normal schedule. In some cases referral to a specialist may be required to determine diagnosis.

It is important that employees who work with health hazards such as dusts, noise and skin irritants are aware of the risks and know that they can report health affects without fear. Occupational Health will alert employees to health risks in particular

environments, ways to avoid exposure and what to do if health symptoms emerge, that is, report any health problems to Management in the first instance.

Information on health risks associated with particular tasks will be given during the induction process.

5.2.1 Health Surveillance for Respiratory Sensitisers and Irritants

Employees in this category are defined as those who require health surveillance under the Control of Substances Hazardous to Health Regulations 2002 and the Management of Health and Safety at Work Regulations 1999, on account of exposure to the following substances:

| | |
|---------------------------|---|
| Grain | Garlic powders |
| Flour | Soy Flour |
| Seasonings, Spices | Powdered egg |
| Fumes from welding/paints | Particular ingredients specific to a recipe |
| Enzyme preparations | Sprayed egg / sprayed colourings |
| Other baking ingredients | Bread improvers (flour treatment agents) |

Occupational asthma is a health conditions that is reportable to the Health and Safety Executive (HSE) under the Reporting Injuries Diseases and Dangerous Occurrences Regulations 1995(RIDDOR):

The aim of health surveillance is to identify employees:

- Who are at increased risk of developing medical problems if exposed to substances
- Who develop medical problems as a result of exposure to the substances used at xxxx

The subsequent aim is to advise on action that will reduce or eliminate the impact of workplace exposure on the individual employee.

Health surveillance can be undertaken by:

- Responsible persons who are trained and authorised by xxxx to monitor health symptoms or complaints on a day-to-day basis eg trained team leaders, first aid personnel, Managers
- Self reporting paper questionnaires which are completed by individual employees and assessed by competent persons for interpretation and to take further action if necessary
- Measurement or testing by Occupational Health eg lung function testing.

Health surveillance procedures and practice will follow best practice guidelines where practicable and will usually be undertaken:

- Initially at pre-placement
- At annual intervals after
- Upon self-reporting of possible work-related symptoms.

For those who work in higher risk areas (as decided by risk assessment) more frequent health surveillance may be required eg at 6 weeks and 12 weeks after starting in the higher risk area.

5.2.2 Health Surveillance for Skin Irritants and Sensitisers

Common skin irritants at xxxx include:

| | |
|---|----------------------------------|
| Chillies | Disinfectants |
| Organic solvents eg MEK | Cleaning products including soap |
| Food products – garlic, tomatoes | Engineering oils |
| Fungal and Bacterial Alpha Amylase present in wheat flour and ingredients | |

Health conditions could include:

- Irritant contact dermatitis
- Allergic contact dermatitis
- Oil acne
- Urticarial
- Folliculitis

The aim of surveillance is to detect any skin changes that could be related to an individuals working environment.

Skin checks will normally be carried out by a responsible person and involve the inspection of the skin on the hands and forearms. Occasionally other areas of the body can be contaminated eg when kneeling down, and if skin is affected should be referred to Occupational Health for opinion.

Frequency will be 3 monthly for most food handlers but monthly if chillies are used.

Skin inspections for mechanics will be monthly.

5.2.3 Health Surveillance for Noise Exposure

This is a requirement for hearing to be assessed under the Control of Noise at Work Regulations 2005

For the purpose of this policy, employees who are exposed to noise at work, are defined as employees who work for part, or the whole of a normal working shift, in areas where noise levels exceed 85dB(A)Leq.

The aim of the surveillance is to:

- Maintain hearing levels in employees
- Identify individuals with hearing loss and prevent further loss
- Provide counselling on the prevention of noise-induced hearing loss
- Give guidance on the use and maintenance of hearing protection
- Test the control measures to dampen noise at xxxx.

Screening will normally be performed by Occupational Health or responsible persons and consists of examination, testing of hearing and information on how to protect hearing and use personal protective equipment eg ear defenders

Frequency of Testing:

- Initially at pre-placement or no later than 12 weeks after commencement of employment
- Annually for the first 2 years of exposure
- If no change then every three years

5.3 Health Assessment

5.3.1 Assessment of Food handlers

A food handler is defined as an employee who is engaged in the manufacture, storage or transport of food products involving direct contact with the product, and/or touching surfaces that may come into contact with unwrapped food. This definition includes those working in the catering trade. It does not include those workers who handle only wrapped food. Employees who are engaged in the milling of wheat to produce flour are not normally considered to be food handlers.

The aim of the screening is to exclude individuals with medical conditions that may either pose a microbiological risk to the product or otherwise present an unusual risk of product contamination.

Screening consists of:

- Pre-placement health assessment before commencing employment
- Review of fitness to work following illness and/or absence from work
- Review of fitness to work after overseas travel
- Review of fitness of visitors and contractors prior to entering food-handling areas

5.3.2 Health Assessment for Large Goods Vehicle (LGV) Drivers (Class 2)

An LGV driver is an individual who requires licensing by the DVLA specifically to drive LGV's. The aim of the assessment is to ensure that LGV drivers do not present a threat to the safety of themselves or other road users on account of a medical condition.

Screening upon appointment of an individual who already holds a LGV licence will be performed by Occupational Health prior to commencing employment. Otherwise screening will follow statutory requirements:

- When first licensed
- At age 45
- And at five yearly intervals until 65
- From age 65 years onwards annually
- After a serious risk incident
- After serious illness or absence which could affect driving abilities.

If the individual does not hold a licence or the licence is due for renewal according to the statutory schedule, medical examination will be performed by the individuals GP.

Occupational Health may recommend restrictions before the DVLA has reached a conclusion.

5.3.3 Health Assessment for Lift Truck Drivers

For the purposes of this policy, a lift truck driver is defined as an individual who is required to drive any of the following:

- Fork Lift Trucks
- Reach Trucks
- Roller (Pallet) Trucks

The aim of the assessment is to ensure that lift truck drivers do not present a threat to the safety of themselves or other employees within the workplace, on account of a medical condition. Screening will normally be performed by Occupational Health Advisors and consists of assessments:

- Prior to commencing driving
- At age 40 and then at five yearly intervals thereafter until age 65
- From age 65 years onwards annually
- After serious illness or absence which could affect driving abilities.

5.3.4 Health Assessment for Non LGV Commercial Vehicles

For the purposes of this policy, drivers of this class of vehicle include individuals who drive commercial road vehicles that do not meet the definition

of LGV. It does not include employees who are allocated Company cars for business and private purposes.

The aim of screening is to ensure that drivers in this category do not present a threat to the safety of themselves or other road users on account of a medical condition. Screening will normally be performed by Occupational Health Advisors and consists of assessments:

- Prior to commencing driving
- At age 45 and then at five yearly intervals thereafter until age 65
- From age 65 years onwards annually
- After serious illness or absence which could affect driving abilities.

5.3.5 Health Assessment for Working in Confined Spaces

Confined spaces are defined as an enclosed space with limited access and egress. It can be any space of an enclosed nature where there is a risk of death or serious injury from hazardous substances or dangerous conditions (e.g. lack of oxygen)

Examples include;

| | |
|------------------|---------------------|
| Storage tanks | Large ovens |
| Silos | Provers and Coolers |
| Reaction vessels | Enclosed drains |
| Tunnels | |

The aim of health screening is to ensure that employees who are required to work within a confined space do not present a threat to the safety of themselves or others on account of a medical condition. Screening will normally be performed by Occupational Health and consists of assessments as follows:

- Prior to working in a confined space
- 5 yearly to the age of 50
- Annually over the age of 50
- After serious illness or absence which could affect working or escape.

5.3.6 Health Assessment for Working at Height

Working at height is defined as any person that could be injured falling from height even if it is at or below ground level. Xxxxx uses many types of strategies that help protect workers from injury and falls which include harnesses, mobile platforms, cherry pickers etc. The need for health assessment will apply when the height is significant and there is risk of a worker's health having a significant impact on their own or others health.

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Examples include:

- Regular roof workers
- Those that climb to tops of SILO's
- Rack climbers
- Telecoms workers
- Tower Crane operators

Working at height health assessment will be normally be performed by Occupational Health as follows:

- 2 yearly to the age of 50
- Annually over the age of 50
- Following sickness absence and is dependent on reason for absence.

5.3.7 Health Assessment for Working in Cold Rooms

Cold room personnel are defined as employees who work for substantial periods of a normal working shift in areas that are maintained at temperatures below 0°C.

The aim of screening is to exclude individuals with medical conditions that may present a threat to their health in circumstances of working at sub-zero temperatures for lengthy periods.

Assessments will be performed by Occupational Health and consists of assessments:

- Prior to commencing cold room work
- Review at 6 weeks after starting working
- Every five yearly intervals to age 40
- Age 40-45 3 yearly
- Age 45-50 2 yearly
- Then annually

5.3.8 Health Assessment for Breathing Apparatus Wearers

For the purposes of this policy, personnel included in this category are employees who are trained in the use of self-contained or air-line breathing apparatus for dealing with emergency situations or in certain occupations which require regular use of breathing apparatus.

The aim of health assessment is to exclude individuals who have medical or other conditions that may present a threat to their own personal safety in the event of using breathing apparatus in emergency situations.

Occupational Health will perform the health assessment:

- Prior to commencing breathing apparatus training
- At five yearly intervals to the age of 50 then annually
- Following serious illness or absence which could affect use of breathing apparatus

5.3.9 Health Assessment for Night Workers

Health assessment of night workers is a requirement of the Working Time Regulations 1998.

Employees who are identified as night workers will be offered screening by questionnaire on appointment and then at annual intervals thereafter. The questionnaire will be distributed by Occupational Health to all identified night workers and, when completed, will be scrutinised to determine any follow up action, which may include a face to face examination.

5.3.10 Health Assessment for New Starters

All staff joining xxxx will be asked to complete a confidential pre-employment questionnaire for Occupational Health to screen. This will ensure that there is no risk from the work to be undertaken. Occupational Health will assist management to consider adjustments to the workplace under the Equality Act. It will be also be an opportunity to conduct the first phase of any health surveillance or screening programme eg baseline hearing or lung function test.

Employees who transfer to new posts within xxxx will be assessed as new starters if there are health risks as highlighted in this policy document in the new post.

5.4 Other

Employees may be identified displaying health symptoms thought to be associated with the workplace. Occupational Health will work with Management to investigate the cause.

5.5 Reporting of Injuries, Diseases and Dangerous Occurrences Regs (Riddor)

Specific health conditions need to be reported to the Health and Safety Executive eg occupational asthma, work related dermatitis. Reports of this nature are entered onto an F2508a form and will be supervised by Occupational Health. Responsibility of reporting lies with Occupational Health in consultation with Management and the safety team.



6.0 Supporting Documents

- Health and Safety Policy
- Accident Reporting
- Dust Policy
- Hearing Conservations Policy
- Hazard Identification, Risk Assessment and Risk Control
- Training Awareness and Competence
- Occupational Health procedure manual
- Lift Trucks
- Drivers

Add any other health risk and associated health checks here