

Occupational Health Surveillance

What is health surveillance?

Health surveillance involves suitable checks on workers (e.g. operatives) to identify any early signs of occupational ill-health, followed by management action based on the results. Health surveillance can:

- provide an early warning if protective measures (such as respiratory protection or gloves) are not working properly; and
- identify what is needed to treat an occupational ill-health condition and prevent further harm.

As illustrated below, health surveillance can range from simple visual checks through to a medical examination.

Various types of health surveillance

Type of surveillance	Who is competent to do it?
Self-checks	<p>Anyone who is exposed to certain hazards and who has been properly trained to look for easily recognisable early signs and other symptoms of disease.</p> <p>(Self-checks should only be done to complement checks by a responsible person. Those who self-check should know who to contact if anything causes them concern.)</p>
A responsible person who does basic checks for signs of disease (e.g. skin problems)	<p>Anyone trained to identify straightforward signs and symptoms caused by working with certain substances or processes, or the self-reported symptoms of using vibrating tools.</p> <p>(This includes managers, supervisors or first aiders who have been trained by an occupational health doctor or nurse to recognise signs or symptoms that need further assessment. A responsible person is not expected to diagnose the cause of the symptoms.)</p>
Enquiries about symptoms, inspection and testing by a qualified person (e.g. respiratory, hearing)	<p>Usually an occupational health nurse (e.g. for signs of asthma) or someone with technical knowledge (e.g. someone carrying out hearing or lung function tests).</p>
Clinical examination	<p>These must be carried out (or supervised by) a medical doctor.</p> <p>(Examination by a doctor is likely to be necessary where health surveillance by a responsible person or an occupational health nurse identifies a possible work-related ill-health issue that needs further investigation, diagnosis and treatment.)</p>

Health surveillance and the law

Regulation 6 of the Management of Health and Safety at Work Regulations 1999 says that: *“Every employer shall ensure that... employees are provided with (appropriate) health surveillance, having regard to the risks to their health and safety, identified by a (risk) assessment.”* Other occupational health legislation, such as ‘COSHH’ and the ‘noise at work regulations’ also refer to health surveillance.

Health surveillance is a legal requirement for workers who are exposed to various ‘harmful agents’, notably hazardous substances (such as asbestos, other harmful airborne material, or skin or respiratory sensitisers); noise; or hand-arm vibration. However, an employer only needs to provide health surveillance for operatives who really need it. HSE says that *“blanket health surveillance of groups of workers can waste time and money, and can give misleading results.”*

However, by law your employer must provide you with suitable health surveillance if the answer is ‘yes’ to **all four** of these questions:

- Is your work known to damage health in a particular way?*
- Are there valid ways to detect the disease or condition in question?
- Is it reasonably likely that damage to health could occur under your particular conditions at work?
- Is surveillance likely to benefit you, the operative? (Health surveillance is only worthwhile where it can reliably show that any harm is starting to happen, or becoming likely.)

Consulting you on health surveillance

By law, your employer must consult with you if you need health surveillance. The HSE says that effective consultation with employees helps employers to:

- spot workplace health risks;
- make sure health protection arrangements are practical; and
- boost company commitment to health surveillance and control measures.

In workplaces where a trade union is recognised, consultation should be through union health and safety representatives. In non-unionised companies, consultation should be either direct or through other elected representatives. When consulting with you, your employer needs to: describe preventative and protective measures that are in place, as well as the system of health surveillance required; tell employees why health surveillance is important; share general information on the results of health surveillance; and privately tell you what they aim to do, based on your individual results.

Your legal duties

Occupational health surveillance is there to help ensure your health at work, but it is also a legal requirement that puts duties on you and your employer. Employees should make every effort to fully comply with this process including attendance of occupational health appointments. Employees medical information is confidential and can only be viewed by a medical practitioner. However where statutory health surveillance is a requirement, relevant

information in a non medical report can be passed on to the employer. In addition to the employer, who is responsible for keeping it, those records can be seen if requested by:

- * you;
- * the HSE; and
- * your employee representative (with your consent).

If you need health surveillance your employer must ensure that:

- anyone carrying it out is competent to do it
- they keep secure records of your health surveillance
- they take proper action based on your individual results – eg further health examination or a different surveillance regime, better risk assessment and control measures, if necessary.

You should be allowed to attend a statutory health surveillance appointment within paid working time, and it will be paid for by your employer.

If you are a ‘safety critical’ worker you may need additional health surveillance checks. General electrical (or M&E) installation is not normally regarded as ‘safety critical’ work, but operatives may become ‘safety critical’ if they also operate hazardous plant or machinery such as MEWPs or lifting equipment.

Two key areas for electrical contractors

Key areas	Suitable health surveillance requires
Dermatitis (inflammation of the skin caused by contact with various materials)	<ul style="list-style-type: none"> • a procedure for managing the risk of dermatitis at work. • an action to reduce risk or identify problems in the early stages.
Respiratory (e.g. asbestos, silica or asthmatic diseases)	<ul style="list-style-type: none"> • a procedure for managing the risk of respiratory disease (occupational asthma) at work. • an action to reduce risk or identify problems in the early stages.

Finally, general health or ‘wellbeing’ check-ups, while potentially informative and beneficial, are an employee benefit, but they are not the same as meeting a legal duty for occupational health surveillance.

If you have any questions or comments about health surveillance and what it means for you, talk to your union representative, other representative, or line manager.

Ends