

Health Surveillance Policy



Title:

Health Surveillance Policy

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Target Audience:

All staff who undertake work activities that have been assessed as requiring health surveillance or monitoring as a control measure.

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Health Surveillance Policy v1 (2016)

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Surveillance, occupational, health, spirometry, audiometry, skin, vibration, RIDDOR

Version Control

Date	Author	Version/Page	Reason for change
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Executive Summary

A key obligation of any organisation is to ensure the health, safety, and welfare of people employed by the organisation.

This policy outlines the framework of the statutory Health Surveillance system and the risk reduction and prevention strategy for NHS Lothian, with due reference to NHS Lothian Occupational Health and Safety policies, procedures and associated procedure documentation, where applicable.

NHS Lothian staff may, as part of their duties, undertake tasks and activities that expose them to risks that may require regular Health Surveillance or Fitness-for-Work assessment. The purpose of Health Surveillance is to identify, at the earliest opportunity, the requirement to institute changes to working practices or specialist clinical support as required.

This policy, and its associated procedures, provides a clear direction for managers to identify their responsibilities for implementation in relation to statutory Health Surveillance, and provides a framework for the management of health surveillance for NHS Lothian staff who undertake tasks and activities where risks to staff health remain after the implementation of all reasonable precautions.

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1.0 Purpose

This purpose of this policy and its associated procedure is to set out the framework for statutory Health Surveillance within NHS Lothian, including:

- Identification of roles and responsibilities associated with statutory Health Surveillance within NHS Lothian.
- Outlining the framework of the statutory Health Surveillance system, and the risk reduction and prevention strategy for NHS Lothian.
- Outlining the arrangements for reporting and monitoring of issues associated with statutory Health Surveillance, including document and statistical data compilation.
- Providing the process for audit and review to ensure the effectiveness of corrective measures and that continual improvement is sought.

2.0 Policy statement

A key obligation of any organisation is to ensure the health, safety, and welfare of people employed by the organisation. This includes consideration of people directly affected by its activities.

The Health and Safety at Work etc. Act 1974 establishes in broad terms the duty of care that NHS Lothian owes to its employees and the core requirements for health and safety. This specifically mentions the need, so far as is reasonably practicable, to ensure the absence of risks to health in connection with the use, handling, storage and transport of articles and substances.

NHS Lothian staff may, in the course of their duties, undertake tasks and activities that expose them to risks that may require regular Health Surveillance or Fitness-for-Work assessment.

Health Surveillance is carried out for those who need it, allows for feedback regarding actions to prevent further harm, allows staff to raise concerns regarding the work activities, and provides an opportunity to reinforce related training and education.

3.0 Scope

This policy is applicable to all staff employed by NHS Lothian, including bank staff, students, and those who have been identified as requiring Health Surveillance as part of a risk assessment process.

4.0 Definitions

4.1 Health Surveillance

Health Surveillance is aimed at the early identification of ill-health, and identifying areas for improvement, related to certain work activities.

Health Surveillance is a system of ongoing health checks for employees working with, or exposed to, environmental risks including: noise, vibration, ionising radiation, hazardous substances, fumes, dusts and biological agents.

Health Surveillance is carried out by competent Occupational Health Clinicians.

Types of Health Surveillance include:

Audiometry – where staff are regularly exposed to noises levels of 85db or above

Hand-Arm Vibration (HAV) – primarily where staff use handheld equipment that vibrates i.e., power tools such as grinders or strimmers

Respiratory (spirometry) – primarily for staff exposed to potential airborne sensitisers and asthmagens at work.

Skin – primarily for staff exposed to sensitisers/irritants, wet work, frequent hand hygiene or glove changes, where exposure to some or all these factors may result in skin disease or reactions/changes to skin.

5.0 Implementation roles and responsibilities

5.1 NHS Lothian staff responsibilities

5.1.1 NHS Lothian Chief Executive and Lothian NHS Board

The NHS Lothian Chief Executive and Lothian NHS Board are responsible for ensuring the full and effective implementation of this policy and of the key aims identified within the [NHS Lothian Health and Safety Policy](#).

5.1.2 NHS Lothian Occupational Health and Safety Service (OHSS)

The Occupational Health and Safety Service is responsible for:

- a. Providing the Chief Executive and NHS Lothian Board with information pertaining to the management of health surveillance within NHS Lothian and professional advice, as required, that corporate responsibilities have been met. This is achieved through quarterly reports received from managers sent into the NHS Lothian Health & Safety Committee to confirm implementation of recommendations made following relevant health surveillance activities.
- b. Providing a point of contact between NHS Lothian and external parties, including relevant enforcing authorities (e.g., the Health and Safety Executive) and governmental

or professional bodies, with due consideration of any potential shared or co-operative arrangements for health surveillance.

- c. Working with line managers to determine the need for and implementing statutory health surveillance within their area, with appropriate documentation.
- d. Ensuring that managers are aware of their assigned roles and responsibilities required to achieve compliance with the provisions of the NHS Lothian Health Surveillance Policy.
- e. Ensuring there is a robust mechanism for the monitoring and validation of the health surveillance system and that measures are in place to provide statistical data on surveillance outcomes.
- f. To provide feedback to relevant managers on the outcomes of health surveillance, to enable actions to be taken to address work-related issues identified, and to provide suitable support and guidance to staff therein.
- g. Ensuring there are suitable arrangements in place for the review and audit of health surveillance to ensure robust systems are in place.

5.1.3 Service/Departmental Managers

Service/Departmental Managers are responsible for:

- a. Ensuring all managers are aware of the NHS Lothian Health Surveillance Policy, and the requirements contained therein.
- b. Liaising with Occupational Health and Safety Services to determine any site-specific conditions that may apply with respect to the management of health surveillance.
- c. Ensuring the NHS Lothian Health and Safety Committee is apprised of the status of health surveillance pertaining to their area of responsibility and is promptly notified of any issues identified, with respect to operational procedures, management controls or significant incidents relating to health surveillance.
- d. Ensuring that information pertaining to the frequency and extent of Skin Health Surveillance, and other statistical data, is readily available for collation by Occupational Health and Safety Services, or at the request of the enforcement body (HSE).
- e. Ensuring that when a formal notification of a diagnosis of an occupational condition has been received by a line manager, in relation to an NHS Lothian employee, that a RIDDOR Form is duly completed and submitted to the Health and Safety Executive immediately. NHS Lothian Health and Safety Services can provide advice and support on how to report an 'occupational illness' related RIDDOR.

5.1.4 Line Managers

Line Managers are responsible for:

- a. Ensuring staff awareness of the contents of the NHS Lothian Health Surveillance Policy, this document, and relevant sections of the associated health surveillance procedure documentation pertaining to their area of responsibility. This is undertaken at induction and periodically at local level through quarterly reporting to maintain awareness.

- b. Determining the need for statutory health surveillance through the process of risk assessment and compliance, and recorded within the appropriate risk assessment (or COSHH Assessment).
- c. Health surveillance should also be recorded in the job descriptions of the posts concerned and in any associated recruitment documentation.
- d. Ensuring that lists of staff subject to statutory health surveillance are created and maintained, and that the NHS Lothian Health Surveillance Policy requirements pertaining to the creation, retention and transfer of documentation is adhered to.
- e. Ensuring that where the outcome of statutory health surveillance is provided by Occupational Health the advice given is applied.
- f. Ensuring that adverse events related to occupational illness are recorded on Datix and investigated in line with [NHS Lothian Adverse Event Management Policy](#) and any RIDDOR reportable incidents reported to the HSE.
- g. Ensuring that, where required a 'Responsible Person' is appointed for Skin Health Surveillance.

5.1.5 All staff

All staff are responsible for:

- a. Compliance and co-operation with the provisions of the NHS Lothian Health Surveillance Policy, this document, and associated procedure documentation, and any information, instruction and training provided by their line management and NHS Lothian. This includes any risk reduction measures identified through risk assessment.
- b. Informing line management of any concerns relating to health surveillance and participating in adverse event investigation where applicable.
- c. Notifying line management at the earliest opportunity of any health-related issue that is linked with a work-related activity or that may impact on the ability of the individual to undertake their regular duties. Alternatively, staff may utilise the Occupational Health self-referral process, where a health-related issue arises, in order to elicit help and support at the earliest opportunity
- d. Ensuring attendance at any Occupational Health appointment made on their behalf.
- e. Appropriate use of Personal Protective Equipment (PPE) issued by NHS Lothian, particularly whilst undertaking any activities where exposure to a hazard, e.g., biological, chemical agents or airborne hazards (including dusts), noise, vibration, or other mechanical hazards.
- f. Complying with information, instruction or training identified by NHS Lothian for the health and safety of employees.

5.1.6 Head of Recruitment

NHS Lothian Head of Recruitment is responsible for:

- a. Ensuring that recruitment documentation includes a mechanism for management to indicate that an advertised post is subject to statutory health surveillance.
- b. Ensuring that NHS Lothian Occupational Health is aware of any statutory health surveillance requirements pertaining to a given post at the pre-placement clearance stage.

5.1.7 NHS Lothian Health and Safety Committee

The NHS Lothian Health and Safety Committee is responsible for oversight of incidents and issues pertaining to Health Surveillance within NHS Lothian.

5.2 Information, instruction, and training

Suitable information, instruction and training is available for managers and staff, which explains the risks and precautions for staff to take to reduce the risk of harm.

In terms of Hand Skin Surveillance, a LearnPro module has been developed for managers, and is available on the LearnPro platform. This is an essential module for managers who have staff that fit the criteria of receiving hand skin surveillance.

Managers have a responsibility to appoint a Responsible Person for Skin Health Surveillance, and there is a requirement for those appointed to complete the Lothian: Hand Skin Surveillance – Responsible Person LearnPro module.

Further information is also available via the NHS Lothian intranet relating to:

- [Noise](#)
- [Hand Arm Vibration](#)

6.0 Associated materials

[Health Surveillance Procedure for Managers \(Skin Health\)](#), approved by the NHS Lothian Health & Safety Committee, February 2016

[Control of Vibration Standard Operating Procedure, NHS Lothian Facilities](#) approved by the Facilities Policy Review Group, October 2021

[NHS Lothian Adverse Event Management Policy](#) approved by the Policy Approval Group, June 2018

[NHS Lothian Adverse Event Management Procedure](#) approved by the Policy Approval Group, June 2018

[NHS Lothian Health and Safety Policy](#) approved by the Lothian Health Board, April 2021

[Radiation Protection Policy](#) approved by the Policy Approval Group, August 2019

[Control of Vibration Standard Operating Procedure](#) approved by the Facilities Policy Review Group, October 2021

7.0 Evidence base

[Health and Safety at Work Etc. Act 1974, section 2](#)

[Health surveillance and occupational health - HSE](#)

[Management of Health and Safety at Work Regulations 2003](#), Regulations 3 and 5, with reference to Regulation 6 which covers Health Surveillance

[Control of Substances Hazardous to Health Regulations 2012](#), Regulations 6,11 and 12, with Regulation 11 dealing specifically with Health Surveillance

[Reporting accidents and incidents at work: A brief guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 \(RIDDOR\) Leaflet INDG453\(rev1\) HSE Books](#)

[The Management of Health and Safety at Work Regulations 1999](#)

[The Control of Noise at Work Regulations 2005](#)

[The Control of Vibration at Work Regulations 2005](#)

[The Public Health \(Infectious Diseases\) Regulations 1988](#)

8.0 Stakeholder consultation

This policy has been reviewed by the NHS Lothian Occupational Health and Safety Service and the NHS Lothian Health and Safety service, was placed on the NHS Lothian Consultation Zone to give all NHS Lothian an opportunity to provide feedback, and was presented to the NHS Lothian Health and Safety Committee.

9.0 Monitoring and review

The effectiveness of this policy will be monitored and evaluated using the outputs from:

- SAE Reviews
- DATIX investigations
- Health & Safety Quarterly Reports
- Staff experience feedback

This policy will be reviewed, as a minimum, every three years, but may be subject to earlier review in the event of changes in the law, guidance or best practice, results from audit or review of the Health Surveillance Management System that identifies significant gaps, omissions, or the need for remedial action, or any other factors that may render the policy in need of review.