Electricity Industry Occupational Health Advisory Group



Guidance Note 1.6

Health Surveillance in the Electricity Industry

The Occupational Health Advisory Group for the Electricity Industry (OHAG) is an independent body of senior occupational physicians. They all have a professional role to provide advice to individual companies in the electricity industry and they meet together three times a year to discuss matters of common interest and to promote good practice in occupational health across the industry. The main route for doing this is by the preparation of guidance notes on topics of interest to the industry. The remit of OHAG and its guidance covers all aspect of the industry from generation, through transmission and distribution to retail and supply.

Until now the promulgation of this OHAG guidance has largely been by means of paper copies of the documents circulating within individual companies in the electricity industry. OHAG recognises that there is a need to make these papers more widely available and is grateful for the support provided by the Energy Networks Association (ENA) in hosting these documents on their website, and the links to them from the websites of the Association of Energy Producers (AEP) and the Energy Retail Association (ERA).

The guidance notes will be of interest to managers, employees and occupational health professionals within the industry. They give general advice which has to be interpreted in the light of local circumstances. Health professional using the guidance retain an individual responsibility to act in accordance with appropriate professional standards and ethics. This guidance is offered in good faith and neither the individual members of OHAG, the companies they support, the ENA, AEP or the ERA can accept any liability for actions taken as a result of using the guidance.

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Health Surveillance in the Electricity Industry

1. Introduction

This guidance has been prepared by the Electricity Industry Occupational Health Advisory Group (OHAG).

In the electricity industry certain workers, by nature of the work that they undertake, can be at risk of developing work related ill-health. Through safe systems of work this risk can be minimised, however where a significant residual health risk exists then a process of periodic medical assessments (health surveillance) is appropriate and necessary in order to ensure the health of employees.

This guidance applies to employers and employees in the electricity industry. It provides industry specific information and expands on guidance issued by the Health and Safety Executive (HSE) in publication INDG 304.

2. Aims of this Document

This aims of this document are:

- to provide an understanding of health surveillance and how this is different to other occupational health assessments
- to outline where health surveillance might be appropriate in the electricity industry

3. Relevant Legislation

- The Management of Health and Safety at Work Regulations 2006
- The Control of Substances Hazardous to Health Regulations 2002
- The Control of Noise at Work Regulations 2005
- The Control of Vibration at Work Regulations 2005
- The Ionising Radiations Regulations 2000
- The Control of Lead at Work Regulations 2002
- The Control of Asbestos at Work Regulations 2006

4. Relevant Guidance

• Guidance on Ethics for Occupational Physicians, 6th Edition, 2006, Faculty of Occupational Medicine

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5. Health Surveillance

a. General Principles

Health surveillance is concerned with the detection and prevention of work caused disease. This may be where there is no direct statutory need, or where it is deemed necessary under legislation including the Control of Substances Hazardous to Health Regulations (COSHH) or the Management of Health and Safety at Work Regulations.

Health surveillance might include a range of assessments from the keeping of a record of exposure to an assessment by an occupational health nurse to a physician based medical examination. It need not necessarily involve complex medical tests or examinations.

Health surveillance is usually required where:

- there is identifiable adverse health affect related to the work
- valid and acceptable techniques exist for the detection of the condition
- there is reasonable likelihood of the condition developing under the particular work conditions; and in addition where
- surveillance is likely to further protect the health of the employees

The need for health surveillance should be determined by a process of risk assessment. Occupational Health (OH) professionals are usually well placed to provide input to the risk assessment process, particularly regarding the suitability of health surveillance. The above bulleted points should always be carefully considered when making decisions about health surveillance. Examples of health surveillance programmes might include those looking for noise induced hearing loss, hand arm vibration syndrome, occupational asthma and occupational dermatitis. By definition health surveillance is not appropriate for conditions such as work stress or back pain.

b. Health Surveillance in the Electricity Industry

Health surveillance is only likely to be appropriate and necessary for certain elements of the operative workforce including those working with noise, hand transmitted vibration and respiratory sensitisers (cable jointing and biomass workers). OHAG Guidance Notes 4.1, 4.3 and 4.5 provide more specific health surveillance guidance.



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Certain workers, for example those involved in nuclear power generation, may require assessments under specific legislation such as the Ionising Radiations Regulations 2000. These assessments are however primarily fitness for work assessments. Similar principles apply for those regularly working with asbestos (The Control of Asbestos at Work Regulations 2006) and lead (The Control of Lead at Work Regulations 2002).

c. Record Keeping

Record keeping for health surveillance can be an area of confusion for employers, employees and OH professionals.

It is the duty of the employing organisation to keep a Health Record for each individual whilst they are under health surveillance and for some time afterwards (depending on the specific Regulations). The Health Record should include;

- identification details of the employee
- the employee's history of exposure to the hazard
- the outcome of health surveillance in terms of fitness for work, and any restrictions required

Health Records should not contain personal medical information, including the details of any clinical assessment performed as part of health surveillance. This should be kept in confidence in the individual's Medical Record held by the OH team. The HSE is entitled to ask to see the employer held Health Record in order to ensure compliance with legislation. The HSE does not however have any right of access to the Medical Record without the consent of the individual or a Court Order.

d. Attendance at Health Surveillance

Employees have a legal obligation to attend for, and to cooperate with, health surveillance where this is required. Without attendance at health surveillance OH will be unable to confirm an employee's fitness for working with the particular hazard.

e. Early Identification of Work Caused III-Health

Health Surveillance is designed to facilitate the early detection of work related disease, thereby minimising longer term ill-health. Identifying work related conditions such as hand arm vibration syndrome (HAVS), noise induced hearing loss (NIHL) and occupational asthma at an early stage can enable interventions (both health and workplace) to be put in place that will prevent the condition progressing thereby limiting longer term disability.

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f. Health Monitoring

Health monitoring is a term introduced by the HSE within the last few years. It is used to describe health assessments, including the recording of information, for individuals engaged in work activities where there is evidence of a causal link between the exposure and a specific health condition, but where the formal criteria for health surveillance are not met. It is therefore best seen as a type of health surveillance.

There is no legal duty to provide health monitoring. An example where the activity might be appropriate in the electricity industry would be low back pain in association with whole body vibration exposure

6. Recommendations

In the electricity industry the need for health surveillance should be carefully considered for employees working with hazards known to be associated with specific diseases. This should include employees working with noise, vibration and respiratory hazards where a significant risk of the particular condition developing exists.

Health Records should be kept for all employees undergoing health surveillance. This should be viewed as management held information and should not be confused with the medical information held by OH in the Medical Record.

Health surveillance should not be confused with other OH activities including fitness for work assessments. The latter refers to ensuring that employees are medically fit for a specific work task e.g. confined space work, working at heights etc. Similarly it should not be confused with voluntary health screening which can be offered to employees in order to detect non work related conditions at an early stage when treatment or a change in lifestyle may be beneficial.

7. Summary

Health surveillance can be a valuable process for the detection and prevention of work related ill-health. In the electricity industry it is likely to be appropriate for certain areas of the operative workforce and in particular workers who are at risk of HAVS, NIHL and occupational respiratory disease (occupational asthma & extrinsic allergic alveolitis).

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8. References & Sources of Further Information

Understanding Health Surveillance at Work (INDG 304), HSE Publications

Regulations as listed in Section 3 'Relevant Legislation