

Health and Safety Standard No. 19

Group	Property, Development and Retail Management
Title	Managing and working with lead
Date	01 March 2016

Overview

Lead, including its compounds, is a substance that has long been known to have the potential to damage health. Excessive exposure can cause lead poisoning. This One Best Way Standard is supported by our Lead Policy document, which outlines Landsec role and responsibility for ensuring those managing, working directly and indirectly on our behalf by:

- a) Protecting the health of people at work by preventing or, where this is not reasonably practicable, adequately controlling their exposure to lead; and
- b) Monitor the amount of lead that colleagues absorb so that individuals whose work involves significant exposure to lead at work can be removed from exposure of such work before their health is affected.

Scope

This One Best Way Standard is an extension of our Lead Policy primarily for the use of Land Securities colleagues and outlines our duty to manage, it also highlights suggested techniques and methodologies for those undertaking work on our sites.

All Principal Contractors, Contractors and Service Partners have a responsibility to ensure that all those employed to undertake work on our sites are similarly assessed by their own companies. When required they need to assure themselves they have suitable measures to record potential exposure, implement relevant control measures and provide their employees with suitable skills, knowledge, training and experience.

Introduction

Lead, including its compounds, is a substance that has long been known to have the potential to damage health, excessive exposure can cause lead poisoning. This policy document outlines Landsec role and responsibilities for ensuring those working directly and indirectly on our behalf by:

- a) Identifying all properties, which has or may have lead in the fabric or structure and carryout the appropriate survey, record the findings and share those findings with all the relevant people.



- b) Protecting the health of people at work by preventing or, where this is not reasonably practicable, adequately controlling their exposure to lead; and
- c) Ensure monitoring the amount of lead absorb so that individuals whose work involves significant exposure (as defined by the Regulations) to lead at work can be taken off such work before their health is affected.

Legal requirements

Landsec takes its responsibilities to those affected directly and indirectly affected by its activities seriously. We ensure that we do not knowingly affect any person and that we will ensure suitable management of all works to comply and exceed the requirements of the Control of Lead at Work Regulations 2002, work in accordance with the Control of Lead at work Approved Code of Practice (Third edition) L132 and consult industry guidance Lead and You (INDG305 (rev2)

Application of the regulations

The Regulations apply to any type of work activity, e.g. handling, processing, repairing, maintenance, storage, disposal etc. which could expose colleagues and any other person to lead as defined in regulation 2 of the Regulations, i.e. to:

- a) metallic lead, its alloys, and all its compounds including lead alkyls
- b) lead when it is a component of any substance or material

The lead must also be in a form in which it is likely to be:

- a) inhaled, e.g. lead dust, fume or vapour
- b) ingested, e.g. lead powder, dust, paint or paste
- c) absorbed through the skin, e.g. lead alkyls or lead naphthenate

All Principal Contractors, contractors, Service Partners and visitors also have a responsibility to ensure that those employed to undertake work on our sites are similarly assessed by their own companies, and in accordance with their own policy.

Site works, pre-project survey

Before commencing any work on site we will ascertain the age of the building and where the disturbance or refurbishment of pre-1960s paintwork is likely we will instruct a Lead Survey, (see Knowledge Library for Approved List Lead Surveyors) the most appropriate survey will be discussed with the surveyor, and supported by the Health and Safety Team, but will include a blend of:

1. Bulk sampling and analysis
2. X-ray Fluorescence (XRF) Inspections



Copies of the lead survey will be uploaded to Landsec Compliance portal DataStation to ensure it's up to date, consistent and available for the duration of property ownership. Copies of the lead survey will also form part of our risk assessment.

What do we have to do?

Assess the risk to colleagues

1. undertake a suitable and sufficient assessment, using the lead survey as a guidance document
2. identify and implement all relevant control measures
3. record the significant findings

Review significant exposure – measure

A colleague's exposure to lead is significant if one of the following three conditions is satisfied:

- a) Exposure exceeds half the occupational exposure limit for lead; or
- b) There is a substantial risk of the employee ingesting lead; or
- c) If there is a risk of an employee's skin coming into contact with lead alkyls or any other substance containing lead in a form, e.g. lead naphthenate, which can also be absorbed through the skin

What is significant exposure and what do we do?

If our colleagues' exposure to lead is 'significant'. We need to:

- Provide colleagues with protective clothing
- Make arrangements for laundering contaminated clothing
- Measure the level of lead in the air they are exposed to, and advise colleagues of the results.

If exposure to lead cannot be kept below a certain level – known as the occupational exposure limit (OEL) we will issue them with respiratory protective equipment and provide them with the training to use the equipment plus arrange to measure the level of lead in their body. This is done by a doctor at their place of work and we will advise them of the results of their tests – typically we will undertake this every three months but this frequency varies on site and potential risk

Introduce control measures, and carry out air monitoring if exposure is significant

- a) Introduce control measures to ensure that the amount of lead in the air in the breathing zone of any employee does not exceed the appropriate occupational exposure limit (OEL); and



- b) Carry out a regular programme of air monitoring if the assessment shows that the exposure to lead is liable to be significant, e.g. above the trigger level of half the OEL, to check that the control measures are working effectively and the OEL is not exceeded.

Provide colleagues with information, instruction and training

Employers have a duty to colleagues to provide them with suitable and sufficient information, instruction and training. The information to be given to colleagues includes:

- a) The possible risks to health of exposure to lead.
- b) Details of the appropriate occupational exposure limit for lead, the action level and suspension level
- c) The results of the employer's assessment of the work.
- d) The appropriate precautions and actions they should take to protect themselves and other colleagues from exposure to lead.
- e) The results of any air monitoring and health surveillance that relate to them personally.

We will ensure, where reasonably practicable, that all lead is removed from site in a controlled manner preceding any intrusive work and in accordance with all health, safety and environmental requirements.

Should total removal be impractical, following guidance from the survey, we will ensure that all those working on a Landsec site, will be provided, via the Principle Designer and Principal Contractor, a copy of the most up to date Lead Survey (this information must also be included in the pre-construction information and the construction phase plan).

We will ensure the Principal Designer and Principal Contractor acknowledges receipt of the survey, and has a suitable mechanism to disseminate the information to all relevant persons, and following receipt of the report will:

- Assess the risk to their colleagues health, and others who can be affected by any proposed work to decide whether or not their exposure is 'significant' and what precautions are needed to protect their colleagues health and record this
- If it is significant, the Principal Contractor, contractor, Service Partner or visitor will, at their own financial expense and in accordance with their policy requirements:
- Put in place systems of work and other controls, such as fume and dust extraction, to prevent or control persons exposure to lead, and keep equipment in efficient working order, in accordance with statutory requirements, industry best practice and manufacturers guidance
- Provide washing and changing facilities, and places free from lead contamination where their colleagues can eat and drink
- Advise their colleagues about health risks from working with lead and precautions they should take via any medium they deem suitable



- Train their colleagues to use any control measures and protective equipment correctly and proactively ensure this is adhered to throughout the duration of the project works
- If their exposure to lead cannot be kept below a certain level – known as the occupational exposure limit – the Service Partner must also issue their colleagues with respiratory protective equipment (RPE)
- Ensure they are suitably trained to use the RPE
- Arrange to measure the level of lead in the colleagues body (blood lead level) via blood screening at a mutually convenient time during work hours by a recognised doctor and advise the employee of these results
- Ensure the blood levels of their colleagues are monitored periodically to monitor the absorption of lead, and that all records are stored in accordance with the Data Protection Act
- Ensure that all contractors and their colleagues act on the doctor's decision, and confirm (in writing) their colleagues will not work with lead again, or be knowingly exposed to it, until the doctor considers it safe for you them to do so
- Ensure additional control measures for women of child bearing age and young persons are considered

Other actions

All other contractors and visitors also have a responsibility to ensure that all those employed to undertake work on our sites are similarly assessed by their own companies. When required they need to assure themselves they have suitable measures to record potential exposure, implement relevant control measures and provide their employees with suitable skills, knowledge, training and experience.

Action to be taken: TBC

Status: Mandatory

Further help and contacts: If you need any further information or guidance please contact any member of the Health and Safety Team.