

Control of Lead Policy

The Control of Lead at Work Regulations 2002 (CLAW) are relevant to all activities carried out on the University campus where lead or lead compounds might be disturbed, displaced or released into the atmosphere, whether that be through maintenance or research activities. This includes metallic lead, its alloys, and all its compounds (including lead alkyls) whether as discrete materials or as a component element of another substance or material (such as a paint or a solder).

Lead presents a significant health risk to individuals and is a cumulative toxin. Individuals can be exposed if they breathe in lead dust, fume or vapour, if they swallow any lead, or, in some instances, through skin absorption. The Regulations place a duty on employers to prevent, or where this is not reasonably practicable, to control employee exposure to lead.

This Control of Lead Policy applies to and within all buildings across the University's campuses, including Gibbet Hill and Wellesbourne, and is supported by arrangements, instructions, and guidance on the procurement and management of lead compounds, which are available on the University's Health and Safety web pages.

Under the provisions of Ordinance 18, Health and Safety in the University, it shall be a duty of all staff, students and others working in the University to comply, as far as it is appropriate, with The Statement of Health and Safety Policy, together with any other rules and guidance that may apply. This Policy, together with supporting arrangements, instructions and guidance, form part of the rules and guidance issued pursuant to The Statement of Health and Safety Policy.

Core Principles

1. Lead and lead compounds should only be used if there are no suitable alternatives: they should be considered a material of 'last resort' due to the risk and additional control measures required.
2. The use of lead or lead compounds in a research setting must be approved at the University Health and Safety Executive Committee, before it is acquired or brought into the University.
3. Lead and lead compounds which are no longer in use or required must be disposed of through an approved disposal route (using an approved University waste contractor as appropriate).
4. Any work which might potentially lead to individuals being exposed to lead or lead compounds must be risk assessed, and this risk assessment needs to be documented in line with the CLAW Approved Code of Practice and Guidance from the HSE.
5. Where the assessment of the risks to the health of individuals identifies that the exposure is liable to be significant then appropriate measures to prevent or adequately control that exposure must be introduced.
6. Exposure would be considered to be 'Significant' where exposure exceeds half the occupational exposure limit for lead, there is a substantial risk of the employee ingesting lead, or if there is a risk of skin contact with lead alkyls or lead in a form which can also be absorbed through the skin.

7. If exposure is liable to be 'significant' then the following must be done:
- Individuals likely to be exposed must be issued with protective clothing,
 - Air monitoring arrangements must be introduced to track lead-in-air concentrations, and,
 - Individuals likely to be exposed must be placed under regular medical surveillance, through referral to the University's Occupational Health Department.
8. Regardless of whether the exposure is likely to be significant or not certain risk control measures must be introduced as appropriate, such as reducing the number of workers exposed to lead, extraction systems, respiratory protection, supervision, training and instruction. There is also a need for the provision of clean facilities for separate storage of clean and contaminated work clothing, and for the provision of warm water, mild skin cleansers, and soft paper or fabric towels for drying, pre-work skin creams and after-work creams to replace skin oils.
9. In addition to this, emergency arrangements must be in place to deal with any significant unplanned events involving lead or lead compounds.

Responsibilities

Heads of Departments are responsible for the implementation of this Policy within their respective Departments and for its communication to their staff and students as appropriate.

All staff and students within departments must comply with this Policy and the associated arrangements, instructions and guidance on lead safety.

The Director of Health and Safety is responsible for advising on the standards and regulations that must be achieved in order to meet legal requirements; for keeping the University's Health and Safety website up to date with the related policy documents, linking such pages to any relevant arrangements, instructions and guidance; and for ensuring that spot checks and audits are carried out to provide assurance that activities are being carried out in compliance with this Policy.

Review

This policy is dated February 2017. The policy will be reviewed at least annually.

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