UNIVERSITY OF WARWICK

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Control of Lead Policy

Document Control:

Policy Owner:	The Director of Health and Safety or equivalent position
Policy Author(s):	Kate Thompson – Author (Safety Lead) Graham Hakes – Communication and Operationalisation.
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Amendment History:

Version Number:	Effective Date:	Summary of Amendments:	Author:
V1 22 03 17	22/3/17	Initial version of document	John Phillips
V2 15 06 18	08/10/18	Modified to allow sign off of purchases by Director and not UHSEC	John Phillips
V2.1 15 06 18	08/10/18	Annual review – no changes	John Phillips
V2.2 15 07 22	04/08/22	Annual review – Minor administrative changes	Stephanie Brown
V2.3 10 03 26	08/05/26	Review – minor amendments, converted responsibilities to a Responsibilities grid, change of template	Kate Thompson

1. Purpose

1.1 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).

2. Scope

2.1 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.

2.2 This Control of Lead Policy applies to and within all buildings across the University's campuses, including Gibbet Hill and Stratford Innovation Campus, 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.

2.3 Under the provisions of Regulation 26, Safety Regulations and associated University Health and Safety Policy document, it is the duty of all staff, students and others working in the University to comply with this Policy, together with any other instructions, rules and guidance that may apply. The scope should provide an overview of **what** is (and is not) included in the remit of the policy.

3. Responsibilities

The table below outlines the key responsibilities associated with this Policy and should be read alongside the detailed role responsibilities set out in the Leadership and Management of Health and Safety at the University of Warwick document

Role	Responsible for
Heads of Departments	Ensuring this Policy is implemented within their respective areas. Including but not limited, ensuring completion of risk assessment, suitable control measures are implemented (including storage, handling and disposal), and that health monitoring Is conducted in their respective areas as required.
Departmental Senior Administrative staff	Supporting Heads of Department in meeting the expectations placed on them in relation to delivering the requirements of this Policy
Technical Services Managers	Ensuring that all technical activities, equipment, facilities, and technical staff within their area are managed safely and effectively. This includes ensuring that relevant risks are assessed, equipment is appropriately maintained, technical staff are trained and supervised, and that all applicable safety arrangements are implemented and communicated within their area.
Supervisors & Managers (including Academic staff e.g. Principal Investigators)	Ensuring that all people, activities, and research projects they lead are planned, conducted, and supervised safely. This includes ensuring that appropriate risk assessments are completed, that staff and students working under their supervision are competent, trained, and supported, and that all safety requirements relevant to their work are implemented and followed.
All staff	Complying with this Policy and the associated arrangements, instructions and guidance.
Occupational Health	Supporting health surveillance if deemed necessary risk assessment
The Director of Health and Safety or equivalent position	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; 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.

4. Policy Statement

4.1 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.

4.2 The use of lead or lead compounds in a research setting must be approved by the Director of Health and Safety, before it is acquired or brought into the University.

4.3 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).

4.4 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.

4.5 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.

4.6 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.

4.7 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.

4.8 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.

4.9 In addition to this, emergency arrangements must be in place to deal with any significant unplanned events involving lead or lead compounds.

5. Associated Documents

https://warwick.ac.uk/services/healthsafetywellbeing/guidance/leadpolicy/