

Health Surveillance & Fitness for Work Assessment Changes in Relation to COVID-19 April 2020

Following the onset of Coronavirus, and the Government restrictions put in place to prevent the spread of the virus and protect the health of employees and the health assessors, there are implications for the continuation of face to face health surveillance and fitness for work assessments. This is due to the proximity of the assessor and the employee in a small space and the nature of some of the tests meaning that the social distancing guidance cannot be met.

HSE Guidance

In response to advice from Public Health England (PHE) on COVID-19, HSE has produced a range of proportionate and flexible guidance to enable health/medical surveillance to continue. The guidance applies where workers are undergoing periodic review under current health and safety regulations. The guidance balances the current constraints presented by the COVID-19 outbreak with the need to protect the health, safety and welfare of workers.

Health Surveillance

Health Surveillance is undertaken as a result of legislation laid down by the HSE to protect employees who work in Noise, COSHH and vibrating tools to ensure that the activities they undertake at work are not impacting their health.

Control of Substances Hazardous to Health Regulations 2002 (COSHH) (Spirometry)

For health surveillance under COSHH regulation 11, the assessment can be undertaken as a paper review by administering the appropriate health questionnaire (e.g. respiratory) remotely. If no problems are identified, then a full assessment can be deferred for three months. Those with problems can be assessed further, for example, by telephone in the first instance. A judgement can then be made on whether to see the worker face to face and, if so, how to do so safely.

For medical surveillance under COSHH Schedule 6, the appointed doctor can use discretion to determine the content of the review. Therefore, they can perform a telephone review and if there are no problems, schedule a full review three months later. Where there is a problem, a judgement can then be made on whether to see the worker face to face and, if so, how to do so safely.

Control of Noise at Work Regulations 2005 (Audiometry)

Providing the worker does not identify any relevant problems, audiometry can be deferred for a period of three months. Where there is a problem, a review can be undertaken by telephone and then a judgement can be made on whether to see the worker face to face and, if so, how to do so safely.

Control of Vibration at Work Regulations 2005 (HAV's)

The usual tiered approach to health surveillance will apply. Questionnaires can be administered remotely. Where there is a problem, a review can be undertaken by telephone and then a judgement can be made on whether to see the worker face to face and, if so, how to do so safely.

Fitness for Work Assessments

Fitness for work assessments are noted as best practice and undertaken for those working in roles where their health could impact their ability to do their job i.e. working at height / working in confined spaces

In light of the current advice from PHE regarding COVID-19 (halting face to face assessments), a benchmarking exercise was undertaken in collaboration with other utility companies who conduct confined space / working at height assessments and a joint decision has been made (in line with the HSE guidance for Health Surveillance) to stop all face to face assessments and instead undertake the assessments via a paper review.

Confined Space / BA / Working at Height fitness for work health assessments

For confined space, BA and working at height assessments a paper-based health questionnaire will replace the face to face assessments (which have currently been deferred for 3 months). Where there is a problem, a further review can be undertaken by telephone and then a judgement can be made on whether to see the worker face to face and, if so, how to do so safely.

The above guidance will be applied to existing employees requiring a review of their Health Surveillance in line with HSE guidance or Fit for Work assessments as per best practice.

New Employees

Health Surveillance for new starters can be completed via a questionnaire (as above) with a face to face assessment as soon as is reasonably practicable.

Confined Space Fitness for work Assessment if a new starter can provide documented evidence that their current fitness for work assessment and training are both valid and in date, we will undertake a further paper-based assessment and if there are no issues, they will be passed fit to undertake confined space work.

If a new starter is unable to provide evidence of medical clearance then they will not be passed fit to undertake confined space activities, there will be no exceptions.

Working at height assessment an appropriate paper health questionnaire will replace the face to face assessments which can be deferred for 3 months. If the paper assessment raises no issues, the new starter will be declared fit to undertake work at height. If there are issues raised, they will not be passed fit to work at height until such time a face to face assessment can take place.

Process

Employees whose health surveillance or fitness for work assessment is due for review will be sent a questionnaire to complete for which ever assessment is required, this will either be emailed to them – where an email address is available, or it will be sent to their work base/site via their line manager for completion. A copy of the form will be available in Polish – **but the form must be completed in English.**

The form will be emailed or sent back to the in house OH Team who will review it and confirm with the individual and their line manager their fitness to work for the next 3 months or until current HSE temporary guidance on health surveillance is amended. If there are health issues raised as a result of the health questionnaire, the in house OH Team will contact the individual to discuss them and determine the employee's fitness to continue to undertake the task for which they are being assessed. The employee and their manager will be informed of the outcome of any additional assessment in writing.

Supporting Documents

Process Map
Health Surveillance Assessment Form (primarily will be used in Viridor)
Fitness for Work Assessment Form (primarily will be used for SWW)
Fitness Certificate

Completed forms

SWW Employees Email the completed form to OHAdvice@Pennon-group.co.uk or post to **Occupational Health, Peninsula House, Rydon Lane, Exeter EX2 7HR**

Viridor Employees Email the completed form to OHAdvice@Viridor.co.uk or post to **Occupational Health, Viridor House, Youngman Place, Priory Bridge Road, Taunton, Somerset, TA1 1AP**