



OFFICE OF RAIL REGULATION

ORR occupational health programme update

April 2013

Introduction

This quarterly brief aims to bring you up-to-date on progress with some of the work under the ORR [Occupational Health programme 2010-14](#), to help inform discussions on health at routine liaison meetings with ORR inspectors. We have identified key messages for rail duty holders and would welcome [feedback](#).

This issue focuses on:

- New free subscription service for ORR health programme updates – [sign up now](#) to be notified when new occupational health updates are published on our web site
- ORR 2013-14 health inspection – includes focus on occupational carcinogens and provision of competent health assistance under the Management Regulations 1999
- Use of tight fitting RPE and the importance of face fit testing
- Free occupational health advice for smaller rail businesses – construction sub-contractors and heritage operators in particular may benefit

1. Subscribe now to receive future ORR health programme updates

We have now set up a [free subscription service](#) for our quarterly occupational health updates. Subscribers will receive an email alert when the latest occupational health update has been published. As we are still building the subscription database we have retained the existing distribution arrangements for this edition, however we plan to move to subscription based email alerts from July, so please sign up now to ensure that you continue to receive future ORR health updates.

Key messages:

- Anyone in the rail industry with an interest in management of occupational health is invited to sign up to ORR's free subscription service for future health programme updates. You can [subscribe now](#) via ORR's web site.

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2. ORR's 2013-14 inspection on occupational health – occupational carcinogens and competent health assistance for managers

In 2013-14, our planned work on health will focus on key health risks including hand arm vibration, musculoskeletal disorders, and occupational carcinogens including asbestos, silica, and diesel engine exhaust emissions (DEEE). A recently published HSE funded [research project](#) on the burden of occupational cancers in Great Britain concluded that over half of all historic occupational cancer registrations (56% of the approximate 8000 annual total) occur in construction workers. The main contributors to work related cancers were found to be asbestos and silica, but exposures to DEEE, also emerged as a significant contributor. In the rail industry there is potential for exposure to asbestos in maintenance and refurbishment of premises in particular; to silica in ballast handling operations and in construction and maintenance activity (for example cutting concrete paving); and to DEEE in stations, depots and tunnels for example. Building awareness of long latency disease through our inspection and influencing work will be important in challenging any potential for complacency in relation to health effects that can take decades to develop.

During this year we will also continue to focus on known areas of poor compliance, including basic COSHH compliance and RIDDOR reporting, as well as assessing the provision of competent health assistance for front line managers and supervisors. At industry level, we will continue work to promote and support improved industry leadership on health; competence in health management; and better intelligence on ill health incidence and costs. More detail on key findings from our 2012-13 occupational health inspection will be reported in our July update.

Key messages:

- Look out for the launch next month, on [NR Safety Central](#), of practical guidance and resources produced by the Ballast Dust Working Group to support improved management of exposure to silica in ballast handling operations. HSE has also revised its free guidance for workers on [control of exposure to silica dust](#), and also on use of [cut-off saws](#) for cutting kerbs, paving or blocks, commonly used in rail maintenance on stations and level crossings.
- Is your COSHH assessment for DEEE exposures current, reflecting a precautionary approach to control? How do you enforce minimum idling time and reduce unnecessary engine revving at stations, worksites and depots? Do you provide and maintain effective general ventilation or exhaust removal systems in areas where DEEE fumes do not readily disperse? Does your procurement policy support the reduction of DEEE exposure?
- Are you complying with Regulation 7 of the Management of Health and Safety at Work Regulations 1999 on provision of competent health assistance? For day to day health risk management, do your front line managers and supervisors have the right level of skills and knowledge to manage health risks in their area of responsibility? Do they have ready access to competent health assistance when they need it? Are you meeting ORR's [good practice guidance on rail manager competence](#) ? Where you might need external support with detailed or technical issues, are you aware of the [HSE good practice guidance on getting specialist help](#)?

3. Respiratory Protective Equipment (RPE) – the importance of face fit testing

[Research](#) published by HSE in 2010 found that less than half of the companies sampled had an effective RPE programme that met current good practice.

Our inspection work has shown a heavy reliance on use of RPE across the rail industry, particularly where the workforce and work site are mobile. We have found widespread use of filtering face piece (disposable mask) RPE with signs of poor fit or adjustment (often indicated by misting of glasses), and a lack of clarity on the requirement for face fit testing of tight fitting RPE. There are a number of challenges to the effective use of tight fitting RPE, including disposable masks. Facial hair around the face seal will significantly reduce the protection provided by tight fitting RPE; this may be a particular issue with night shift workers who may not have shaven before starting a shift. We have found similar fit issues around compatibility of tight fitting RPE with some other mandated personal protective equipment (PPE), including head and eye protection (side arms on safety glasses breaking the RPE face seal), and with communications equipment (for example boom mikes and radio communication). The correct selection, use, storage and maintenance of appropriate RPE is critical to ensuring legal compliance and protecting rail workers from harmful exposures to hazardous substances.

Health and safety law requires that PPE, including RPE, should only be used as last resort when all other control methods have been considered. As it is the last line of defence, it is essential that RPE is both adequate and suitable. RPE should not be seen as a cheap and easy option, and requires a robust management system. The RPE selected must provide an adequate level of protection for exposure to the substance concerned (the Assigned Protection Factor will help to inform this). It also needs to be suitable - right for the wearer, task and work environment. It needs to fit the individual wearer's face properly in order to prevent leakage. It is unlikely that one particular type or size of RPE face piece will fit everyone. Tight fitting RPE, which includes full face mask, half mask, and filtering face pieces (disposable masks) must be fit tested as part of the RPE selection process to ensure that the equipment selected is suitable for the individual. Where an individual wears more than one type of tight fitting RPE, each type should be fit tested.

RPE fit testing should be conducted by a competent person who is appropriately trained, qualified and experienced, and is provided with appropriate information to undertake each particular fit testing task. Fit testing can be done in-house or by an external provider. The [British Safety Industry Federation](#) (BSIF) has introduced an accreditation scheme for face fit testers, which may provide evidence to help you decide whether a fit tester is competent. The [Fit2Fit accreditation scheme](#), supported by HSE, has been designed to confirm the competency of any person performing face piece fit testing –it is not compulsory but is one way to demonstrate good practice.

Records of the results of face piece fit testing should be kept for at least five years from the date of testing; personalised fit test reports should be available to the employee concerned, and collective reports should be available to safety representatives. Face fit testing does not remove the need for correct and careful day-to-day fitting of the face piece which should always include a pre-use fit check.

Further detailed practical advice for employers and employees on RPE selection and on face fit testing is available on [HSE's website](#).

Key messages:

- Do you have effective arrangements to ensure the correct selection, use, storage and maintenance of RPE? For tight fitting RPE does the selection process include appropriate fit testing? Do you have any workers using tight fitting RPE who have not been fit tested?
- Are the appropriate types of fit test carried out – qualitative tests for filtering face pieces (FFP) and half masks, quantitative for full face masks (can also be used for FFPs and half masks)?
- How do you ensure that individuals know which types of tight fitting RPE are suitable for them, and that a sufficient range of RPE is available at each workplace, particularly where there is a company pool of disposable RPE?
- Is initial and refresher training provided on correct use, cleaning, maintenance and storage, including donning the RPE and pre-use checks? Do workers, supervisors and managers understand the importance of a good face seal when wearing tight fitting RPE, including the need to be clean shaven and ensuring other PPE doesn't break the seal?
- Can the competent person responsible for face fit testing demonstrate understanding of the requirements of the relevant Regulations and Approved Codes of Practice on fit testing, as well as the fit test methods, equipment, and interpretation of results, and RPE pre-use checks?
- Are records kept of fit test reports including details of the person fit tested; make, model and size of the face piece; the test method and results (pass/fail or fit factor value); date and details of the fit tester?

4. Free occupational health advice for rail businesses

Rail companies can get free advice on a range of work-related health and wellbeing issues via the [Health for Work Adviceline](#), a key part of the governments Health, Work and Wellbeing initiative. This free service provides online and telephone access to professional occupational health advice and guidance on a range of issues including employee retention, health screening and surveillance, mental health in the workplace, occupational health providers and services, and sickness absence management. Rail construction and renewals companies can also seek free sector specific advice via the [National Construction Adviceline](#), a partner scheme managed by [Constructing Better Health](#)

- **Make use of the free help available. Small and medium sized rail businesses, for example construction sub-contractors and heritage operators, are encouraged to explore what the free occupational health advice services have to offer.**

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