

### 1. Haringey Council Procedure

1.1 Haringey Council are committed to ensuring the health, safety, and welfare of all its employees at work, of pupils while they are engaged in activities in our schools, contractors with whom it has partnerships to deliver services, as well as members of the public who live within or access its properties. Working with lead can put your health at risk, causing symptoms including headaches, stomach pains and anaemia. Other serious health effects include kidney damage, nerve and brain damage and infertility. The Control of Lead at Work Regulations 2002 (CLAW) place a duty on employers to prevent, or where this is not reasonably practicable, to control employee exposure to lead. This procedure will ensure that Haringey Council controlled premises are as safe as is reasonably practicable from the potential hazards arising from exposure to lead and lead dusts.

### 2. Scope of Procedure

2.1 The Council has responsibility for a large number of buildings (e.g., public, and administrative buildings, schools, commercial properties, works depots, care facilities of various types). The Council recognises its responsibilities for the management of lead both as the employer (where this is the case) and also in discharging its duty of care to staff, the public, including pupils and service users who may be affected by **the Council's undertakings**.

2.2 Lead-based paints were widely available and used. Therefore, most old houses or buildings will contain some lead-based paint. In poorly maintained buildings the lead paint flakes and peels off and can then be inhaled or ingested. Uncontrolled or uncontained dust and debris from renovation works or repainting can expose the workers doing the work and occupants of the building to unsafe levels of lead.

- Lead pigments were widely used in paints for homes, schools, and offices until the 1960s.
- Lead pigments were not removed from commonly used paints until the early 1980s.
- Lead paint can be found under existing paintwork in older buildings.

### 3. Key Terms and Summary Information

#### 3.1 Key Terms

Lead	Lead is a toxic heavy metal, it is found in many different products including rolled lead sheeting, paints, glass, solder, plastic, and rubber compounds, therefore, workers can be exposed to lead in a variety of work activities.
Your body absorbs lead when you:	Breathe in lead dust fume or vapour Swallow any lead for example if you eat, drink, smoke or bite your nails without washing your hands and face.
Vulnerable persons	Woman of reproductive capacity, and young persons are particularly susceptible to lead poisoning  "Young person" means a person who has not attained the age of 18 and who is not a woman of reproductive capacity.

Accidental release	An accident, incident, or emergency, for the purpose of regulation 12, is any event which causes, or threatens to cause, any employee to be exposed to lead or a lead compound on a scale or to an extent well beyond that associated with normal day-to-day activity.
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#### 4. Responsibilities for Implementation

4.1 **Directors, Heads of Service and Head Teachers** are responsible for implementing and monitoring compliance with this procedure in their area or school.

4.2 **Managers** are responsible for implementing this safety procedure in their areas of responsibility, and where appropriate providing the necessary resources to others for its implementation.

4.2.1 Ensure that all staff who report to them are made aware of the content of this procedure.

4.3 **Staff** are required to work in a safe manner and adhere to the content of this safety procedure.

#### 5. Specialist Advice

5.1 The council provide specialist advice by employing competent qualified health and safety practitioners, who are part of the Corporate Health and Safety Team. They can be contacted by telephone or email: 020 8489 4520, [health.safetyadvice@haringey.gov.uk](mailto:health.safetyadvice@haringey.gov.uk)

#### 6. Other documents you may need to consider

6.1 **HSP 15 Control of Substances Hazardous to Health.**

6.1.1 [Lead and You HSE Guidance INDG305](#)

6.1.2 [Old Lead Paint - What you Need to Know as a Busy Builder](#)

6.1.3 HSP 05 Management of Contractors.

#### 7. Responsibilities

7.1 Directors, Heads of Service and Head Teachers shall ensure sufficient nominated individuals are appointed to undertake monitoring of contractors working on areas where lead may be present.

7.1.1 Directors, Heads of Service and Head Teachers shall ensure that all areas of premises under their control that are known to contain lead are detailed and a list is in place of these locations.

7.1.2 Managers will ensure this information is shared with any contractor engaging in work activities that could potentially release lead dusts i.e., sanding, scraping, or rubbing of old paint work.

7.2 Services with control and responsibility for maintaining buildings shall complete an assessment of the locations of lead, lead containing materials such as paint and its condition.

### 8. Actions to Take

8.1 The most common locations of lead in Haringey properties which could affect health is in older painted surfaces such as window frames. Before any works on areas potentially containing lead are started or commissioned the person responsible for the works must consult the Corporate Landlord Register held on Technology Forge (TF) to ascertain if the area has been tested for lead and lead compounds.

8.2 Where Lead has been identified in existing painted surfaces appropriate working practices must be adopted. The following steps are considered best practice. Haringey employees and contractors working on behalf of Haringey must follow these procedures.

- Plan the work – Only strip back old paint if it is flaking, chipping or it is a risk to people.
- If paint is in poor condition, remove using a combination of chemical paint stripper, wet abrasive paper and on-tool extraction.
- If paint is in good condition use waterproof abrasive paper to make a key for the new coat of paint.
- Remove any debris with a damp cloth.
- Keep your immediate work area clean and tidy.
- Clear up and get rid of any lead waste at the end of the day.
- Place any debris, cloths, abrasive paper in a plastic bag for disposal.
- Make sure all protective equipment fits correctly and is in good condition.
- Only eat and drink in designated areas that are free from lead contamination.
- Practice a high standard of personal hygiene:
  - Wash your hands and face and scrub your nails before eating.
  - Wash and/or shower before you go home.
- Wear any necessary protective equipment or clothing and return it to the Proper place provided.
- Do not take home any protective clothing or footwear for washing or cleaning.
- Use all of the equipment provided and follow the instructions for use.
- Report any damaged or defective equipment to your line manager.

8.3 Where there is no information on the Lead Register a risk assessment must be completed to decide on next steps. Items to consider would be -

- Age of the building, pre-**1980's**.
- Type of structure involved, is it likely that any painted surfaces could potentially contain lead?
- Is a non-intrusive lead survey required?
- Will a Safe System of Work (SSoW) be required?
- What level of competence will be required from contractors working on the area?
- What level of supervision will be required from?
  - The Contractor
  - The Local Authority

8.3.1 If it is decided that a lead survey is required to identify the presence and extent of lead, a competent contractor must be engaged to complete a non-intrusive survey using handheld conventional X-ray fluorescence (XRF) equipment, before works are started.

- 8.3.2 Results of lead surveys must be reported to the Corporate Landlord Compliance Manager and then uploaded onto the Lead Register where lead and or lead containing materials have been identified.
- 8.4 Contractors engaged to carry out redecoration, refurbishment and repairs must have suitable and sufficient information, instruction, and training in working with paints that may contain lead and carry out work following the above procedures. It is the responsibility of the Project Manager, Site Manager, or person commissioning the works to communicate these procedures and to monitor the contractor to ensure adherence to this procedure.
- 8.5 Wherever possible, if work is to be undertaken and there is a possibility that there may be an exposure to lead, then this work should be undertaken when the building is not in use. For example, in the case of a school the work should be carried out during the weekends or Schools Holidays.
- 8.6 In the event of dusts or fumes being created from lead containing paints or suspected lead containing paints the following actions must be taken.
- Cease work immediately.
  - Isolate the affected area, if working indoors close all doors leading to other parts of the building and ensure all persons who could be affected are moved away from the area.
  - Where possible dampen the affected area to reduce the amount of airborne dust.
  - Wipe clothing over with a dampened cloth to remove any loose dust.
  - Wash hands and any exposed skin thoroughly with soap and water.
  - Notify the Corporate Landlord and Haringey Health and Safety as soon as possible.
9. Record Keeping
- 9.1 Records of all assessments of lead and subsequent Safe Systems of Work (SSoW) and reviews shall be made and stored in a retrievable format. Where an assessment is carried out, a record of the results and recommendations should be provided to the Manager/responsible person for action. This record will be kept, until a subsequent assessment has been undertaken and should be archived in a retrievable format.
10. Monitoring and Review
- 10.1 A variety of monitoring systems must be utilised to ensure adherence with this procedure including departmental monitoring checks.
- 10.2 **This safety procedure must be reviewed by the Council's Health and Safety Manager (HSM) within a period not greater than 26 months. In addition, it will be revised by the HSM as soon as practicable where changes in statute or industry best practice deem the content out of date.**
11. Approval of the Procedure
- 11.1 This safety procedure was reviewed by the Corporate Health, Safety and Wellbeing Board and approved by the Council's Head of Organisational Resilience on 22/11/2021. Any required variations from this safety procedure should be brought to the attention of the Council's Head of Organisational Resilience.

Approved by (print name): Andrew Meek, Head of Organisational Resilience

Signature:

A handwritten signature in blue ink, appearing to read 'AM', is written over a faint, light blue circular watermark.

Date: 22/11/2021