6. Risk Assessments

A brief guide to controlling risks in the workplace

6.1 The importance of Risk Assessments

Health and Safety rules can often feel like an inconvenience, but in reality they are there to protect us and those around us. Statistics released by the HSE in reported that 144 workers in Great Britain were killed whilst at work in 2015-2016. This begs the question, was there a suitable Risk Assessment in place?

A Risk Assessment is not only an important step in ensuring a safe and healthy work environment, it is a legal requirement. It needs to be conducted before employees complete work on current, new or unknown parts, processes or materials. You must consider the possible causes of harm and what steps to take in preventing the harm in the first place. If your business has less than 5 employees, you don't have to document anything but you must have considered hazards and control measures.

A good Risk Assessment will help to prevent accidents and ill health. These not only have the potential to ruin lives, but they could also increase costs to businesses through lost output, compensation claims and higher insurance premiums.
Courts are now being given tougher sentencing guidelines which are now stricter than ever in tackling health and safety legislation breaches. So with this in mind, why risk something going wrong?

Before we start, it's crucial to note that contrary to popular belief, spotting potential hazards by conducting a risk assessment is not a way of stopping people from doing things, rather it identifies ways of enabling people to do things in a safe manner.

Protect yourself and your colleagues

As part of managing the health and safety of your business, you must control the risks in your workplace. To do this you need to think about what might cause harm to people and decide whether you are taking reasonable steps to prevent that harm.

This is known as risk assessment and it is something you are required by law to carry out. **If you have fewer than five employees you don't have to write anything down.**

A risk assessment is not about creating huge amounts of paperwork, but rather about identifying sensible measures to control the risks in your workplace. You are probably already taking steps to protect your employees, but your risk assessment will help you decide whether you have covered all you need to.

Think about how accidents and ill health could happen and concentrate on real risks – those that are most likely and which will cause the most harm.

For some risks, other regulations require particular control measures. Your assessment can help you identify where you need to look at certain risks and these particular control measures in more detail. These control measures do not have to be assessed separately but can be considered as part of, or an extension of, your overall risk assessment.

Identify the hazards

One of the most important aspects of your risk assessment is accurately identifying the potential hazards in your workplace.

A good starting point is to walk around your workplace and think about any hazards. In other words, what is it about the activities, processes or substances used that could injure your employees or harm their health?

When you work in a place every day it is easy to overlook some hazards, so here are some tips to help you identify the ones that matter:

- Check manufacturers' instructions or data sheets for chemicals and equipment as they can be very helpful in explaining the hazards and putting them in their true perspective
- Look back at your accident and ill-health records – these often help to identify the less obvious hazards.
- Take account of non-routine operations (eg maintenance, cleaning operations or changes in production cycles).
- Remember to think about long-term hazards to health (eg high levels of noise or exposure to harmful substances).

There are some hazards with a recognised risk of harm, for example working at height, working with chemicals, machinery, and asbestos. Depending on the type of work you do, there may be other risks that are relevant to your business.

Who might be harmed?

Then think **how** employees (or others who may be present, such as contractors or visitors) might be harmed. Ask your employees what they think the hazards are, as they may notice things that are not obvious to you and may have some good ideas on how to control the risks.

For each hazard you need to be clear about who might be harmed – it will help you identify the best way of controlling the risk. That doesn't mean listing everyone by name, but rather identifying groups of people (eg people working in the storeroom or passers-by). Remember:

Some workers may have particular requirements, eg new and young workers, migrant workers, new or expectant mothers, people with disabilities, temporary workers, contractors, homeworkers and lone workers (www.hse.gov.uk/ toolbox/workers).

Think about people who might not be in the workplace all the time, such as visitors, contractors and maintenance workers.

Take members of the public into account if they could be harmed by your work activities.

If you share a workplace with another business, consider how your work affects others and how their work affects you and your workers. Talk to each other and make sure controls are in place.

Ask your workers if there is anyone you may have missed.

Evaluate the risks

Having identified the hazards, you then have to decide how likely it is that harm will occur, ie the level of risk and what to do about it. Risk is a part of everyday life and you are not expected to eliminate all risks. What you must do is make sure you know about the main risks and the things you need to do to manage them responsibly.

Generally, you need to do everything 'reasonably practicable' to protect people from harm. This means balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble. However, you do not need to take action if it would be grossly disproportionate to the level of risk.

Your risk assessment should only include what you could reasonably be expected to know – **You are not expected to anticipate unforeseeable risks.**

Look at what you're already doing and the control measures you already have in place. Ask yourself:

- Can I get rid of the hazard altogether? If not, how can I control the risks so that harm is unlikely?

Some practical steps you could take include:

- Trying a less risky option;
- Preventing access to the hazards;
- Organising your work to reduce exposure to the hazard;
- Issuing protective equipment;
- Providing welfare facilities such as first aid and washing facilities;
- Involving and consulting with workers.

Improving health and safety need not cost a lot. For instance, placing a mirror on a blind corner to help prevent vehicle accidents is a low-cost precaution, considering the risks. Failure to take simple precautions can cost you a lot more if an accident does happen.

Involve your workers, so you can be sure that what you propose to do will work in practice and won't introduce any new hazards.

If you control a number of similar workplaces containing similar activities, you can produce a model risk assessment reflecting the common hazards and risks associated with these activities.

You may also come across model assessments developed by trade associations, employers' bodies or other organisations concerned with a particular activity. You may decide to apply these model assessments at each workplace, but you can only do so if you:

- Satisfy yourself that the model assessment is appropriate to your type of work; ˜ adapt the model to the detail of your own work situations, including any extension necessary to cover hazards and risks not referred to in the model.

Record your significant findings

Make a record of your significant findings – the hazards, how people might be harmed by them and what you have in place to control the risks. Any record produced should be simple and focused on controls.

If you have fewer than five employees you don't have to write anything down. But it is useful to do this so you can review it at a later date, for example if something changes. If you have five or more employees you are required by law to write it down.

Any paperwork you produce should help you to communicate and manage the risks in your business. For most people this does not need to be a big exercise – just note the main points down about the significant risks and what you concluded.

An easy way to record your findings is to use the risk assessment template (See appendix 1)

A **Risk Assessment** must be suitable and sufficient, ie it should show that:

- A proper check was made;
- You asked who might be affected;
- You dealt with all the obvious significant hazards, taking into account the number of people who could be involved;
- The precautions are reasonable, and the remaining risk is low;
- You involved your employees or their representatives in the process.

Where the nature of your work changes fairly frequently or the workplace changes and develops (eg a construction site), or where your workers move from site to site, your risk assessment may have to concentrate more on a broad range of risks that can be anticipated.

If your risk assessment identifies a number of hazards, you need to put them in order of importance and address the most serious risks first.

Identify long-term solutions for the risks with the biggest consequences, as well as those risks most likely to cause accidents or ill health. You should also establish whether there are improvements that can be implemented quickly, even temporarily, until more reliable controls can be put in place.

Remember, the greater the hazard the more robust and reliable the measures to control the risk of an injury occurring will need to be.

Regularly review your risk assessment

Few workplaces stay the same. Sooner or later, you will bring in new equipment, substances and procedures that could lead to new hazards. So it makes sense to review what you are doing on an ongoing basis, look at your risk assessment again and ask yourself:

- Have there been any significant changes?
- Are there improvements you still need to make?
- Have your workers spotted a problem?
- Have you learnt anything from accidents or near misses?
- Make sure your risk assessment stays up to date.

6.2 Accident reporting

The Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations 1995 require employers to report certain accidents and diseases to their local authority. The incident must be work related and, in the first instance, involve being unable to work for seven days or more. Other types of accident are reportable but these usually cause the over-seven day rule to kick in, examples being: penetrating eye injury, broken limb, electric shock. Full details are available:
http://www.hse.gov.uk/riddor/what-must-i-report.htm

http://www.hse.gov.uk/pubns/priced/l73.pdf

Reportable diseases include:
Occupational asthma
Occupational dermatitis
Certain types of poisoning are also reportable and these may be linked to nail products (glues, etc.).

Injuries to members of the public resulting in them going to hospital directly from the salon are also reportable. This must be work related and not a medical emergency: a heart attack or similar is not reportable. If a client faints and bangs their head and goes to hospital this would not be reportable but if they tripped over a loose wire and went to hospital with an injury this would be. If in doubt, you can always check with us.

The purpose of the reporting is help devise accident prevention strategies not to catch you out or prosecute.

http://www.hse.gov.uk/riddor/report.htm

Reports are monitored by local authorities and investigated according to severity of injury.

Some cases of work-related disease are also reportable: these include dermatitis and asthma.

Needless to say, death at the workplace should be reported as quickly as possible and, outside of normal office hours, the police must be informed and they can contact the enforcing authority (although there is usually an out-of-hours contact number).

6.3 Dermatitis

Essentially, there are three types of dermatitis:

1. The first is caused by frequent washing that removes the natural oils and greases that protect the skin. The cure is to use hand creams that rehydrate the skin. Hand cream can be used to prevent this or gloves used as barrier. Some solvents have a similar degreasing effect, for instance ethanol or acetone.

2. The second type is contact dermatitis, where the chemical actually burns the skin – some of these are used in hair treatment and gloves must be worn when using them, for example, peroxide used for lightening hair colour.
3. The third type is the result of an allergic reaction to a substance: a tiny amount of the product causes rapid and painful inflammation of the skin. The best preventative technique is to substitute a different product that does not cause a reaction, but gloves are the next best.

Frequent hand washing can cause degreasing of the skin whereby soaps remove the natural oils which protect skin. This results in a red 'sore' appearance that can be treated with replenishing hand creams. Prevention can be achieved by using mild soaps (described as 'sensitive skin') and frequent application of hand cream. If the problem persists, then gloves must be used, preferably non-latex or powder-free latex. Non-latex gloves include vinyl and nitrile. Powdered latex gloves must be avoided because they can produce an allergic reaction.

Contact dermatitis is caused by chemicals actually burning the skin and the best prevention is to substitute another product. If this is not possible, then gloves must be worn (see above for selection). Where the manufacturer tells you to use gloves it is essential that you follow the guidance. Where gloves are provided with the product, make sure they are suitable: often single use plastic is in the pack and these can split or leak very easily.

There are a number of chemicals that can, over time, produce an allergic response such that even if minute quantities are around, the reaction will occur. In recent years, paraphenylenediamine (PPD) has been added to hair dyes and been responsible for a number of sensitisations in staff as well as clients. Once sensitised, there is no going back – any contact with the sensitising substance will cause the reaction. Increasing exposure thereafter can increase the effect and consequences.

The HSE has a website on dermatitis with further information:

http://www.hse.gov.uk/skin/employ/dermatitis.htm

6.4 Asthma

Occupational asthma is different from the more normally encountered asthma in that it is caused by substances at work. These can be chemicals or even biological materials. The biological materials, e.g. skin, hair, nails are recognised as respiratory sensitisers. Many of the common substances used I n the nail industry, e.g. acrylates, can make an asthmatic condition worse, but to date are not known to cause asthma.

The problem with occupational asthma is that it is very unpredictable: someone who is not prone to asthma can develop an allergic response to a substance after years of exposure; then the tiniest exposure can set off the response:

wheezing, difficulty breathing, etc. While we do not like to be alarmist, it can be a life threatening condition and some workers have had to change jobs.

The only action available once sensitised is to stop working with the substance causing the asthma, and while there may be alternative products, sometimes those alternatives do not give the finish that the client or practitioner want.

The best course of action is prevention and this requires the provision of extract ventilation preferably as close as possible to the source of the substance. Just removing the odours from the room is insufficient – preventing inhalation is essential.
One of the most effective control measures is pre-employment screening of prospective employees to identify any individuals who may have conditions that could be affected by work

6.5 Chemicals and product safety

All products should be safe to use as cosmetics, but they can have occupational health effects so it is important to obtain the material safety data sheets (MSDS) for all products used. Provided they are used in accordance with the manufacturers' instructions there should not be a problem e.g. wear vinyl gloves, eye protection, etc.

To deal with health and safety issues for staff reference must be made to the Control of substances Hazardous to Health Regulations 2004. These require the employer to control the exposure of employees to hazardous to a safe level. These safe levels are set in EH40 Workplace Exposure Limits and are defined as the maximum levels that do not affect health.

The COSHH Regulations require the employer to assess the exposure of the employees and, in order to make that assessment, the employer must have an understanding of the hazards involved.

However, 'ensure good ventilation' is a very general expression that requires more consideration. Consider the health effects if these are minimal or not listed fine, but if they are severe (for example, intoxication, poison, causes dizziness, etc.) then the ventilation must be very good.

In order to reduce the impact of substances on beauty therapists, it is important to:

- Keep the work room well ventilated – this means that air must be brought in as well as extracted
- Use good techniques to minimise exposure to harmful chemicals: keep tops on bottles, use narrow opening tops on bottles, use a bin with a lid (preferably metal)

- Wash hands regularly and use moisturiser – use gloves when necessary
- Use a local extractor or down draught table for nail work
- Use eye protection when necessary, particularly with solvents like acetone which can dissolve the cornea if splashed into the eye and cause blindness

Good Practice

Good practice involves using methods to reduce exposure to all harmful substances and promote good hygiene techniques to prevent biological contamination/transfer.

1. Volatile substances should be stored in narrow neck bottles and applied sparingly to reduce air loading with the vapour.
2. Waste cotton wool, tissues, wipes should be stored in a metal bin with a lid to keep odours down.
3. Extract ventilation is essential when dealing with products that may cause sensitisation. In nail bars the preferred extraction is a downward draught through the table to the

outside or a breathing zone extract hood. Filtered/recirculating systems are of limited use with nail products!

4. No eating, drinking, or smoking in the work area.
5. When instructed by the manufacturer, wear suitable protective gloves and eye protection. Suitable goggles are essential with some solvents, particularly Acetone, which can dissolve the cornea.
6. Sleeves should be full length to protect the forearms from contact with chemicals.
7. Where you do not wish to alarm the client by wearing goggles etc., then arms-length operations may be used. These protect the eyes by providing a significant distance between the product and eyes.

6.6 Slips, Trips and Falls

Slips, trips and falls are the major cause of accidents across all industry sectors and yet they are the most easily preventable.

The golden rules:

1. After washing floors, carefully rinse off (this removes the dirt and detergent which can dry on to produce a slippery surface), then DRY MOP using a mop specially reserved for the purpose.
2. Clear up all liquid spillages immediately, preferably using kitchen paper and ensure that the surface is dry.
3. Clear up all spillages and debris on floors, for example, hair clippings
4. Ensure all electrical cables are safely routed such that they cannot form a trip hazard

Eliminating the causes of slips, trips and falls can reduce personal suffering from injuries, reduce costs to the NHS, and save you facing costly compensation claims.

6.7 Musculoskeletal Disorders: Aches and pains

Working in the beauty industry often requires adopting awkward postures whether it's keeping your arms at shoulder height working on someone's hair or bending over a table doing close work on nails.

The important thing is to adjust the work area wherever possible:

1. Adjust the height of the bed in beauty to fit the staff member – this means you should be able to keep your arms at a comfortable height.
2. Try to avoid bending over a bench to work on nails. Make sure you have the correct glasses (if you need them) and consider using magnifiers. If you can't help bending in close, take regular breaks to straighten your back.
3. Avoid bending at the waist whenever possible: use your knees to vary your height or to pick things up from floor level - your legs have much stronger muscles than your back!
4. Frequent short breaks are essential and these can be built into your work routine.

Whatever you do, try to vary your position as much as possible, even for short periods of time – this prevents muscles 'freezing' and developing problems for the future.

It is important to avoid draughts as these can cause muscles to cool and cause pains with 'differential cooling' i.e. one muscle cools while its matching muscle doesn't causing a 'twist' which shows up as an ache.

6.8 Asbestos

Around 5,000 contractors die every year from asbestos related diseases. These are plumbers, electricians, plasterers, and joiners who have had accidental exposures over their working lives and die and mesothelioma, a particularly aggressive form of cancer.

Looking to the future, legal requirements have been brought in to hopefully eliminate these accidental exposures and prevent deaths which are so tragic to family and friends. It is repeated exposure over a period of time that causes the condition and it often takes 20 – 30 years to take effect.

What do you have to do?
The duty is to manage asbestos containing materials on your premises. This means:

- Identifying any asbestos containing materials
- Assessing the condition of any suspect materials and making safe if necessary
- Informing contractors of any suspect or confirmed asbestos containing materials prior to the contractor starting work.

The most serious types of asbestos you may come across are Asbestos Insulating Board often used for ceilings and lagging (a white powdery material often wrapped onto pipework) used on hot water pipes in boiler rooms.

You are very unlikely to have a boiler room big enough to require lagging, but there are a number of ceilings with asbestos insulating boards. Just because it's there you don't have to remove it: if you don't disturb then it is perfectly ok.

In the event you need specialist advice, you should try the HSE website or contact your local authority before paying for what could be an expensive asbestos survey.

Asbestos ceiling tiles

Asbestos Insulating Board used as cladding on a fire door

6.9 Electricity

Portable Appliance Testing has limited value in the beauty industry: much of the equipment is double insulated and doesn't have an earth so the test is not appropriate. More important are regular pre-use visual checks: is the plug ok? Does the cable have a fixed point into the equipment? Is the cable clean and undamaged?

The advent of moulded plugs has eliminated the risk of wires coming loose from screw terminals within the plug (the earth wire could come loose and touch the live pin making earthed metal equipment live).

With regard to the mains installation, it should be checked from time to time by a competent electrician: the time interval depends on the age of the installation and the level of use. A hair salon using driers would need checking more frequently than a nail bar because of the heavier power requirements (kilowatts = power).

Sockets need checking

And the supply…

6.10 Gas

Following the condition that no naked flames (sources of ignition) should be in the salon, the need for heating and hot water needs to be addressed.

Ideally, some form of radiator would be best for heating and in the absence of a central heating boiler, electrically powered oil-filled radiators are suitable.

Needless to say, the gas boiler should be located in a separate room and tested annually by a Gas Safe engineer.

Do not use open electric fires or LPG heaters in a salon because of the fire risk. LPG heaters are NOT suitable in salons.

The main hazards from gas are explosion and carbon monoxide poisoning. Regular maintenance and safety checks are essential and may only be carried out by Gas Safe registered gas fitters. It is illegal for anyone to work on gas appliances if they are not Gas Safe registered! Before starting work, check that your gas engineer is registered and has the correct approvals for working on your type of equipment.

6.11 Sun beds

It is illegal for persons under the age of 18 to use sunbeds in a tanning salon – fines of up to £20,000 can be imposed on businesses for failing to comply.

Ill health effects are associated with Ultra Violet light including:

- Burns
- Skin dryness and itching
- Eye irritation/conjunctivitis
- Skin cancer
- Cataracts
- Premature aging of the skin

Records must be kept of each client's use of the sunbed in your salon and advice given on safe exposure (skin type and length of time to be spent on each session).

The way in which you comply with the law will be for you to decide but introducing the following procedures may assist you in this process:

Management controls

- Train and advise staff on how to check the age of users, including the types of document that can be used to prove age.
- Have written procedures for staff for dealing with people who may be under 18, train staff in these procedures and keep records of this training.

- Keep a written record of any incident (and outcome) where a member of staff challenges a potential user about their age.
- Maintain written records for each user for each session.
- Use till prompts for sunbed use transactions, if the facility is available.
- Display prominent and clear notices that no under-18s are permitted to use sunbeds.
- Display prominent notices by the restricted zone advising that no under-18s may enter the zone.
- Have a system in place to check that under-18s have not entered the restricted zone.
- Ensure when sunbed facilities are provided as part of a membership package, such as at a leisure centre or fitness club, that access to sunbeds is excluded from the membership package for under-18s.
- Provide information on restricted services in brochures and service directories.
- Train and advise staff who are under the age of 18 on the requirement not to use sunbeds (and explain that this is not affected by the fact that they can be present in a restricted zone).

6.12 Fish pedicure

These were very fashionable in 2012 but seem to have disappeared as quickly as they appeared. But if you are still in the process of using fish pedicures the following is some of the conditions you would need to follow.

There are a number of conditions that indicate a client should not have a fish pedicure:

- Leg waxing or shaving in previous 24 hours
- Any open cuts/wounds/abrasions/broken skin on feet or lower legs
- Infection on feet including athlete's foot and verruca
- Psoriasis, eczema or dermatitis in treatment area
- Blood borne infections: Hepatitis B or C or HIV
- Diabetes
- Bleeding disorders or anticoagulant medication
- Any immune deficiency condition

The main concern has always been about infection since the fish use the water as a toilet, but provided the client does not have open wounds and wash their feet carefully afterwards the risk is considered minimal. Most water tanks are treated with ultra violet light which can be an effective steriliser provided the water is clean and clear. Filters are used to remove solid matter and should be cleaned regularly.

6.13 Spray tanning

There are no established chemical hazards in the use of spray tanning equipment although some sources (well-known newspapers who are renowned for mixing up the facts) claim they cause cancer if breathed in.

Solutions used in spray tanning may contain **nuts** so it is important to carry out an allergy test before use: on the client and the operative.

The containers the spray tan solution arrives in can be very heavy so some means of transporting them around the salon would be a good idea: a trolley or barrow.

If spraying using a gun, a non-slip floor is essential. Spraying booths tend to be fitted with appropriate flooring.

Always follow the manufacturers' instructions.

6.14 Insurance

Employers' Liability (Compulsory Insurance) Act 1969

If you are a family business or only employ people closely related to you then you may not need Employers' Liability Insurance. However, if an employee becomes sick or is injured while at work then they may claim compensation. This is what the insurance is for and it is a legal requirement.

Additional information is available at:
http://www.hse.gov.uk/simple-health-safety/get.htm

http://www.hse.gov.uk/pubns/hse40.pdf

Public Liability Insurance is not a legal requirement but it is a good idea to take this out as it offers protection against claims from the public and/or clients.