Policy – Biological testing

About this Policy

* 1. This policy applies to the (Production Company) (‘the Company’) and sets out its approach to testing members of its cast, crew and key staff who work with or exposed to isocyanates and styrenes. It supplements, but does not replace, the Company’s Health and Safety, Safe Working Guide, and Sickness Absence policies communicated to you from time to time.
	2. This policy:
		1. does not form part of any contract of engagement and the Company may amend it at any time;
		2. applies to certain cast members, crew and any other key staff (which includes all employees, workers and contractors) who work with or are exposed to isocyanates and styrenes ; and
		3. has been written following HSE regulations, where employers have a legal duty to monitor the health of their crew if the work they do poses a risk to their health. Therefore, the production is obliged to carry out occupational health monitoring for chemicals such as isocyanates and styrene.
	3. The information set out in this policy is taken from guidance on the HSE and other Government websites that are updated frequently, as well as from the Company’s own internal policies and procedures. While we will try to keep this policy up-to-date, we strongly recommend that all members of the cast, crew and key staff familiarise themselves with the relevant HSE and other guidance and check regularly for updates.

Why we think workplace testing is important

1. Isocyanates and styrenes are chemicals found in manufacturing industries and various products, including polyurethane foams, paints, adhesives, and plastics. The primary isocyanate exposure routes are through the respiratory tract and the skin. Historically, the focus has been on inhalation exposures.
	1. Exposure to isocyanates can cause range of symptoms, which, according to the HSE may include
* irritation of the eyes, nose and throat
* [dermatitis](https://www.hse.gov.uk/skin/employ/dermatitis.htm)
* [occupational asthma](https://www.hse.gov.uk/asthma/index.htm)

For further information, please visit the HSE website.

Based on advice and independent recommendations received by the Company, and taking into account the members of the cast, crew and key staff working with isocyanates on the production, the Company has introduced a urine sample test to be conducted by (insert vendor). The purpose of this test is to assess the crew's members exposure levels to isocyanates and to establish a baseline at the start of work. This baseline will be compared to follow-up test results to check that our safety measures and mitigations adequately protect the crew from chemical exposure.

While we recognise that testing is not an immediate or total fix, it is our view that, together with the control this by using the appropriate measures below:

* Ventilation – make sure there is enough fresh air in the work area. Open doors and windows etc. The higher the risk the better the ventilation will need to be;
* Eye protection – wear eye protection (eg goggles or a face shield) when doing work where splashes / aerosol may get into the eyes.
* Gloves – [gloves](https://www.hse.gov.uk/skin/employ/gloves.htm) should be right for the products you are using – single use disposable gloves made of suitable materials (eg nitrile) are preferable. Make sure the breakthrough time and permeation rate are right for the type and length of the work. Check with the manufacturer / supplier. You may need gauntlet style gloves to prevent skin exposure.
* Overalls – disposable overalls are preferred. Launder significantly contaminated re-usable overalls before wearing them again.
* Washing – good [washing facilities](https://www.hse.gov.uk/construction/healthrisks/welfare/toilets-and-washing.htm) are essential. Wash off any product on the skin as soon as possible. Do not use solvents to do this. Workers should be encouraged to wash exposed skin at breaks and after finishing work. Skin care products can also help replace the natural oils that help keep the skin's protective barrier working properly.
* Respiratory Protective Equipment (RPE) – you may need [RPE](https://www.hse.gov.uk/respiratory-protective-equipment/index.htm) where ventilation does not provide enough control – particularly in enclosed spaces if you are creating an aerosol (eg by some rollering work) or using products with significant amounts of TDI. Wearers should be [fit tested](https://www.hse.gov.uk/respiratory-protective-equipment/fit-testing-basics.htm) where needed. It is particularly important to select the correct filter. For example, P3 particulate filters provide protection against spray mist but do not protect you from vapours. You will need the right gas / vapour filter for these. Change them at suitable intervals. Check with your supplier if you're not sure.
* First aid – give adequate and appropriate [first aid](https://www.hse.gov.uk/firstaid/index.htm) treatment to anyone affected by isocyanates. You may also need to seek further medical attention.
* Train: Workers need to know how to use the controls properly. They also need to be aware of the signs and symptoms of ill-health from isocyanate exposure.

Testing arrangements

You will be required to confirm your consent to the test. If you consent, the nurse will coordinate the collection of your sample, record it confidentially and share the results with you. The test for isocyanates and styrene are a separate sample, they will not be able to identify any other markers in the urine.

What this means for you

* 1. We have engaged an approved vendor to manage the testing of your sample. The sample process will be administered and planned around working schedules for members of the cast, crew and key staff. Initially the Company has planned for the base line test to be conducted on the first day of work. Subsequent tests will be conducted every 3-6 weeks based on cadence of work.

Should you have further question, please contact either your Production Safety Supervisor, TWDC Production Safety or HR/ER.

*The Company’s expectations*

* 1. The Company takes your safety in the workplace seriously and considers it an important tool to help prevent the risk of exposure to members of its cast, crew and key staff
	2. As an integral part of the Company’s health and safety measures and taking into account the productions unique circumstances, all members of the cast, crew and key staff that work directly with isocyanates and styrenes are required to be tested where it is safe to do so in individual circumstances.
	3. All members of the cast, crew and key staff have a moral responsibility over their own health and safety and that of others who may be affected by their actions at work. By failing to participate in the sample process or not following the relevant controls in place you may be putting yourself and others at risk. Please therefore familiarise yourself with this policy.
	4. As part of this testing process, the Company is:
		1. Working with a vendor to manage the testing process;
		2. explaining the sample and testing process (ie how testing works, how members of the cast, crew and key staff get their results and what to do if you test positive); and
		3. seeking to alleviate any concerns members of the cast, crew and key staff may have about testing or the controls in place when working with the chemicals.
	5. The testing process will be either:
		1. administered and planned around your working schedule.,
		2. you will be supported by the nurse should you have questions when providing your sample,
	6. In other circumstances, you will be required to provide a urine sample. This will ordinarily be upon arrival at the workplace. However, where appropriate in certain limited circumstances we may arrange for the sample to be administered at another location, such as when on location.
	7. The test result will be confirmed with in email to the HoD and Production Safety Supervisor with the results and numbers associated as the process is pseudonymised,
	8. If your test result is negative, your test result will be confirmed verbally to you by the health & safety consultant and you may continue to work.
	9. If, however, your test result is positive, the results will be shared with you and you will be asked to contact your Production Safety Supervisor and HR/ER who will inform the Company of your positive test result. You will further be required to:
		1. conduct work that does not include exposure to the chemicals. These duties may be different to the task you were originally hired to complete
		2. follow up with GP for further support if you have any symptoms;
	10. Notwithstanding the above, the Company recognises that providing a sample may not be suitable for everyone, and there may be legitimate reasons why members of the cast, crew and/or key staff cannot get tested, for example on medical grounds. If you have any concerns about participating in the workplace testing based on your individual circumstances, please discuss this with your manager or HR/ER.
	11. If you do not participate in the Company’s workplace testing programme without a legitimate reason or you fail to follow any reasonable management instruction to provide a sample, as set out in paragraph 4 above, the Company reserves the right to treat such failure as gross misconduct or misconduct and take appropriate disciplinary action in line with the Company’s ACAS Code of Practice.
	12. We will continue to keep the situation in relation to testing under review in our ongoing COSHH assessments.
	13. Any bullying, harassment or victimisation of crew in relation to workplace testing will not be tolerated, and will be dealt with under the Company’s policies on Anti-Harassment and Bullying Policy.

Processing your personal data

* 1. Information relating to an individual's isocyanates and styrenes testing is health information, i.e., special category personal data under applicable data protection legislation in the UK.
	2. We may need to process such information to:
		+ Conduct and record isocyanates and styrenes tests: This includes collecting and processing test results (e.g., from urine samples) to assess crew member exposure levels.
		+ Monitor crew member: To track potential health effects related to isocyanate and styrene exposure and provide appropriate support.
		+ Fulfilling legal and regulatory obligations: To comply with applicable health and safety regulations, including the UK Control of Substances Hazardous to Health Regulations 2002 (COSHH) and relevant occupational exposure limits set by the Health and Safety Executive (HSE). These requirements ensure proper risk assessment, monitoring, control of isocyanate and styrene exposure in the workplace.
		+ Improve workplace safety: To assess the effectiveness of existing control measures, such as local exhaust ventilation (LEV), personal protective equipment (PPE), work process modifications, and implement necessary improvements to minimise crew member exposure. This includes reviewing air monitoring data, biological monitoring results, and work environment conditions to enhance overall safety.
	3. All isocyanates and styrenes test results and related personal data will be treated with the utmost confidentiality. Access to this information will be restricted to authorised personnel on a need-to-know basis. We will implement appropriate security measures, such as secure data storage and access controls, to protect the confidentiality and integrity of your personal data.
	4. Your Rights
		+ You have certain rights regarding your personal data, including: the right to access your test results and other relevant information, the right to request correction of inaccurate information, and the right to object to certain types of processing in specific circumstances
	5. Contact
		+ If you have any queries or concerns about how we will collect and process your personal data in relation to isocyanates and styrenes testing, please contact Data Protection Officer at emea.dataprotection@disney.com.

Changes to this policy

* 1. HSE guidelines and restrictions and business and industry best practice regarding working isocyanates and styrene will continued to be monitored. We reserve the right to modify this policy at any time in our sole discretion to adapt to changing circumstances and business and industry needs, consistent with our commitment to maintain a safe and healthy workplace.