



Chartered  
Institute of  
Environmental  
Health

# Response by the Chartered Institute of Environmental Health to the Health and Safety Executive.

HSE Consultation on revision  
of guidance leaflet INDG209  
'Reducing health risks from  
the use of UV tanning  
equipment'

17 July 2008

# The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

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## 1.0 Initial statement

- 1.1 The CIEH has been involved in the production of this draft guidance but feels it appropriate to contribute to the consultation phase as well.

## 2.0 Comments

- 2.1 We welcome the updating and provision of new information but the guidance does not appear to provide a strong enough message, given the evidence of harm that can occur and especially given the increasing incidence of skin cancer.
- 2.2 We accept that there are limitations for regulatory control under Health and Safety legislation but this guidance is "branded" as a joint document with the Department of Health who as an organisation should be addressing the "public health" issues. There is a risk that the broader problems attached to sunbed use may not be fully addressed unless the Department of Health takes action to control practices through other mechanisms.
- 2.3 By focusing on the strict health and safety issues in the guidance to duty holders, it does not seem to line up with the customer advice i.e. the customer advice is strong on seeking advice from the operator. This would require competence in the operator but this is not sufficiently reflected in the advice to duty holders i.e. this is only briefly mentioned after the need to ensure staff can correctly run equipment. This needs to be strengthened.
- 2.4 Separately, the use of the phrase "it is suggested good practice" is extremely weak and appears to be a reduction in protection provided by previous guidance. Particular concerns are in relation to the provision of eye protection, cleaning of equipment, provision of assistance to customers and especially the need to have trained staff present during use.
- 2.5 Overall, the guidance needs strengthening and beyond this, we believe that mandatory controls are needed to prevent use by under 18s and operation of unmanned facilities. Given that Scotland is implementing such measures we would encourage Government to rapidly move towards equivalent measures for public protection across other parts of the UK