

Reference No: E107/29/90; **Date:** 17/02/94

Circular 3/1994:- Safety, Health and Welfare at work (General Application) Regulations, 1993; requirements for work with display screen equipment and visual display units

A Dhuine Uasail

I am directed by the Minister for Finance to refer to the Safety, Health and Welfare at Work (General Application) Regulations, 1993, which place a wide range of legal obligations on employers in relation to the protection of the safety and health of their employees in the workplace. This Circular deals with the matters covered in Part VII of the Regulations, which concerns display screen equipment and gives effect to EC Council Directive 90/270/EEC. All Departments will be affected by the matters covered in this Circular. In addition, each Department should carefully examine the other provisions in the Regulations to ensure compliance with any measures which are of particular relevance to the circumstances in that Department.

Exclusions:

2. The Regulations do not apply to

- drivers' cabs or control cabs for vehicles or machinery;
- computer systems on means of transport;
- computer systems mainly intended for public use;
- portable display screen equipment not in prolonged use at a workstation;
- calculators, cash registers and any equipment having a small data or measurement display required for direct use of the equipment; and
- "typewriters with windows."

Regulations concerning equipment and environment

3. Under the Regulations employers are required

- to perform an analysis of workstations (i.e. visual display screen equipment and optional accessories, e.g. telephone, document holder, chair, desk, work surface and immediate work environment) to evaluate safety and health conditions, particularly risks to eyesight, physical problems and mental stress;
- to take appropriate measures to remedy any risks found as a result of such analysis, taking account of any additional or combined effects of any such risks found;
- in performing such an analysis and remedying any risks found, in the case of workstations already in use on or before 31 December, 1992, to take account of the requirements in paragraph 4 below which are marked with an asterix;
- to take appropriate steps to ensure that workstations already in use on or before 31 December, 1992 are adapted to comply with all the requirements set out in paragraph 4 below not later than 31 December, 1996;
- to take appropriate steps that workstations first put into service after 31 December 1992 comply with all of the requirements set out in paragraph 4 below.

All future requests for tenders for workstation equipment should lay down strict requirements for compliance with the required standards. The Office of Public Works have confirmed that all desks, desk surfaces and chairs for VDU use supplied by its Furniture Branch comply in full with the requirements.

4. The minimum requirements for display screen equipment contained in the regulations are as follows:

General

*(a) The general use of the equipment shall not be a risk to employees.

Display screen

*(b) The characters on the display screen shall be well defined and clearly formed, of adequate size and with adequate spacing between the characters and lines. The image on the screen shall be stable, with no flickering or other forms of instability. The brightness or the contrast (or both) between the characters and the background shall be easily adjustable by the employee and easily adjustable to ambient conditions. The screen shall be free of reflective glare and reflections liable to cause discomfort to a user.

(c) The screen shall be able to swivel and tilt easily and freely to suit the needs of the user. It shall be possible to use a separate base for the screen, or an adjustable table.

Keyboard

*(d) The keyboard shall have a matt surface to avoid reflective glare. The arrangement of the keyboard and the characteristics of the keys shall be such as to facilitate the use of the keyboard. The symbols shall be adequately contrasted and legible from the design working position.

(e) The keyboard shall be tiltable and separate from the screen so as to allow a user to find a comfortable working position which avoids fatigue in the arms or hands. The space in front of the keyboard shall be sufficient to provide support for the hands and arms of the user.

Work desk and work surface

(f) The work desk or work surface shall have a sufficiently large, low reflectance surface and allow flexible arrangement of the screen, keyboard, documents and related equipment. The document holder shall be stable, adjustable and cause minimal need for uncomfortable head and eye movement. There shall be adequate space for users to find a comfortable position.

Work chair

(g) The work chair shall be stable and allow the user easy freedom of movement and a comfortable position. The seat shall be adjustable in height. The seat back shall be adjustable in both height and tilt. A footrest shall be made available to any user who requires one. However, these requirements shall not be construed as preventing the use of alternative suitable seating.

Space

*(h) The workstation shall be dimensioned and designed so as to provide sufficient space for the user to change position and vary movements.

Lighting

*(i) Room lighting or spot lighting (or both), including work lamps, shall ensure satisfactory lighting conditions and an appropriate contrast between the screen and the background environment, taking into account the type of work and the user's vision requirements. Possible disturbing glare and reflections on the screen or other equipment shall be prevented by co-ordinating workplace and

workstation layout with the positioning of the artificial light sources. Workstations shall be so designed that sources of light, such as windows and other openings, transparent or translucent walls, and brightly coloured fixtures or walls cause no direct glare and, as far as possible, no distracting reflections on the screen.

(j) Windows shall be fitted with a suitable system of adjustable covering to attenuate daylight falling on the workstation.

Noise

(k) Noise emitted by equipment belonging to a workstation shall be taken into account when a workstation is being equipped, in particular so as not to distract attention or disturb speech.

(l) Workstation equipment shall not produce excess heat which could cause discomfort to employees. An adequate level of humidity shall be established and maintained.

Radiation

*(m) All radiation, with the exception of the visible part of the electromagnetic spectrum, shall be reduced to negligible levels from the point of view of the protection of employees' health and safety.

Software

(n) In designing, commissioning and modifying software, and in designing tasks using display screen equipment, the following shall be taken into account. Software shall be suitable for the task, easy to use and, where appropriate, adaptable to the employee's level of knowledge or experience. No quantitative or qualitative checking facility may be used without the knowledge of the employees. Systems shall provide feedback to employees on their performance. Systems shall display information in a format and at a pace which are adapted to employees. The principles of software ergonomics shall be applied, in particular to human data processing, i.e., the employee/computer interface must be comfortable to work with and not be frustrating to the operator (e.g., error messages should be meaningful, the use of colours and graphics should be appropriate to the application, and system response time should be reasonable).

Breaks:

5. Employers are required to arrange activities so that work on visual display screen equipment is periodically interrupted by breaks (e.g., tea-breaks, lunch breaks, etc.) or changes of activity which reduce the workload at the display screen. Departments should take measures to ensure that the minimum breaks required to comply with this provision are actually taken by the staff concerned. Employees should not normally be required to work for more than three hours without a break.

Training:

6. Employers are required to provide training for employees in the use of workstations before they commence work with display screen equipment and whenever the organisation of the workstation is substantially changed.

Eye and eyesight tests:

7. In certain circumstances, employees shall be entitled to an appropriate eye and eyesight test carried out by a competent person. While employers may make various tests a condition of employment, there is no obligation, under the Regulations, for employees to take eye and eyesight tests. They may opt to take no test, an eyesight test alone or an eye and eyesight test. Departments may make their own

arrangements for providing such tests and delegated sanction is granted to pay fees up to the level paid by Social Welfare for PRSI contributors. However, Departments are encouraged to seek volume discounts or special arrangements to minimise cost or inconvenience. Employees on the full PRSI rate should arrange their own tests with an optician in the Social Welfare scheme and Departments will only be liable for fees where the contribution conditions have not been fulfilled. For the convenience of Departments, this Department will continue to supply, at regular intervals, a list of competent persons familiar with the conditions attaching to tests for civil servants.

The circumstances where entitlement arises are:

- (i) before commencing display screen work;
- (ii) at regular intervals thereafter;
- (iii) if an employee experiences visual difficulties which may be due to display screen work.

In regard to the test before commencing display screen work, new entrants to the service are generally required to provide a certificate that their eyesight is suitable for VDU work. In such circumstances, it would be unusual for a new entrant to request a further test within a short period of entry. In regard to repeat testing, staff may be permitted further tests after intervals of five years when they are under 40 years of age and after intervals of two years thereafter. Employees shall also be entitled to an ophthalmological test if the eye or eyesight test show it to be necessary.

Special corrective appliances

8. If the results of the ophthalmological test show that it is necessary, and if normal corrective appliances cannot be used, employees shall be provided with special corrective appliances appropriate for the work concerned. Special corrective appliances should be understood as appliances which are required only to remedy a specific eye problem related to operation of a VDU and not for any other purpose. Requests for such appliances should be very rare. To ensure consistency of approach in the application of this provision, any request for payment for special corrective appliances should be referred to this Department prior to any commitment being made to refund the cost of the appliances.

Pregnancy:

9. The Regulations do not provide for any special conditions attaching to pregnant employees. However, where a pregnant woman is apprehensive about the continuous use of display screen equipment during pregnancy, she may be permitted to opt for other work where such work is available (all reasonable efforts should be made to accommodate staff in this regard).

Photo-sensitive epileptics/Certain medication

10. Photo-sensitive epileptics should seek medical advice before working on VDUs. Employees should be advised that certain drugs such as Valium and Librium affect the speed of eye movements and could lead to eye-fatigue.

11. Please bring this circular to the attention of all officers in your Department/Office. Any enquiries from Departments/ Offices about this circular should be made to the Department of Finance, Agriculture House, Kildare St., Dublin 2 (Telephone GTN 7109-3543 or 01-6767571 Ext. 3543). Personal enquiries should be made to the Personnel Unit of the employing Department/Office.

12. This circular supersedes Circular 12/84.

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J McGovern
Assistant Secretary