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20 April 2026

HSE CLAW Consultation on Safe Lead-in-Blood Levels - Concerns for Heritage Conservation

Dear Lady Twycross,

As the CEO for the Institute of Conservation (Icon), I am writing to raise concerns regarding the Health and Safety Executive (HSE)'s current consultation on proposed changes to safe lead-in-blood levels under the Control of Lead at Work Regulations 2002 (CLAW).

While the conservation-restoration profession fully supports a focus on improving health and safety measures for professionals working with lead, there is significant concern that the proposals currently being consulted on risk having serious and unintended consequences for heritage conservation-restoration professionals and the care and conservation of the UK's heritage. Professionals conserving our nation's historic stained glass, where the use of lead is essential and no viable alternatives exist, will be particularly impacted.

Impact on Heritage Collections and the Historic Built Environment

Stained glass conservator-restorers play a crucial role in the care and maintenance of the UK's listed buildings, historic churches, and heritage collections. Lead is a fundamental material in this work and cannot be substituted without compromising the integrity, safety, and authenticity of historic fabric.

Any regulatory changes that fail to reflect these professional realities risk undermining the sustainability of heritage craft skills that the UK Parliament has repeatedly recognised as nationally important.

Equality and Workforce Concerns

A key concern with the current consultation is the significant disparity in the proposed draft blood-lead thresholds between "women of childbearing capacity" (the term used by HSE) and other workers. I have included, below, a summary of the proposed changes to levels:

Category	ACTION LEVEL			SUSPENSION LEVEL		
	Current Action Level	First incremental change 1 st Oct 2027	Second incremental change 1 st Oct 2029	Current Suspension Level	First incremental change 1 st Oct 2027	Second incremental change 1 st Oct 2029
General Employees	50	20	10	60	30	15
Women of reproductive capacity	25	5	n/a	30	7.5	n/a
Young Person (16-17 years)	40	20	10	50	30	15

Whilst the profession fully understands and supports the need to protect all individuals, including women and unborn children, from the damaging effects of high lead-in-blood levels, if implemented as currently proposed, this legislation could effectively exclude most women from working in stained glass conservation and other heritage disciplines involving lead, regardless of individual circumstances, risk controls, or personal choice. There is particular concern that:

- Employers may become reluctant to employ women in roles affected by the proposed legislation being consulted on (and some recruitment practices and roles may already have been impacted).
- Women already working as professional stained glass conservators may see their careers become non-viable should the HSE proposed legislation be implemented.
- Barriers to entry for women would be created in sectors and specialist professions that have worked hard to successfully improve gender equality and diversity.

This would represent a significant regression for equality in conservation-restoration professions and appears to conflict with wider government commitments on inclusive employment and professional skills development.

Sector Engagement and Constructive Solutions

Organisations across the heritage and conservation sector, including professional membership bodies, conservation-restoration groups, and specialist practitioners, are keen to work constructively with the HSE. The aim is to achieve and maintain safe and healthy working practices, providing the highest levels of protection, without the unintentional exclusion of women or the erosion of essential heritage skills and degradation of our nation's ability to care for its heritage.

Evidence recently gathered from across the conservation-restoration profession to inform the consultation, included data on existing lead-in-blood levels, working practices, and risk management processes. This evidence demonstrates that improved protections can be achieved through proportionate, evidence-based approaches rather than blanket exclusions.

We therefore ask you, as Parliamentary Under-Secretary of State for Museums, Heritage and Gambling, to:

- Encourage the HSE to fully consider the equality, skills, and heritage impacts of its proposals
- Ensure the consultation process meaningfully engages with the heritage sector and particularly professionals working in stained glass conservation-restoration
- Raise awareness of these concerns within Parliament where appropriate, particularly in relation to equality, employment, and heritage protection

We believe it is possible to improve both the health of the workforce and the future care for our national heritage (both built historic assets and collections). In order to achieve this, it is vital the final proposals are genuinely informed by real-world professional practice.

Thank you for taking the time to consider this issue. We would be grateful for your support in ensuring that the current HSE consultation effectively protects the health of conservator-restorers without causing unintended harm to people or heritage.

Yours sincerely,



Emma Jhita
CEO, The Institute of Conservation (Icon)