

# **CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH**

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## **PART 1 POLICY AND RESPONSIBILITIES FOR THE IMPLEMENTATION OF COSHH**

### **1.0 INTRODUCTION**

This document details the County Council's policy and procedures for the implementation of the Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH).

The COSHH Regulations aim to reduce levels of occupational ill health caused by exposure to harmful substances by requiring employers to assess the risks to health and safety from hazardous substances and prevent or adequately control exposure as far as is reasonably practicable.

A definition of hazardous substances is given in Appendix 3.

Individual Service areas may need to prepare their own specific guidance and systems of work based on this document.

### **2.0 SUMMARY OF RESPONSIBILITIES FOR COSHH**

#### **2.1 Headteachers and Managers Must:**

- Identify all hazardous substances used, stored, handled or generated in their area of work and compile an inventory.
- Decide whether each substance is still required or whether it can be eliminated.
- Minimise the number of different hazardous substances in use in a premises.
- Consider the practicality of preventing exposure to hazardous substances.
- Ensure that risk assessments are carried out or obtained for all hazardous substances remaining.
- Check the risk assessments adequately cover the work activities concerned and are signed and dated.
- Draw the risk assessments to the attention of the relevant employees and ensure they have received adequate information and training, keep records of this training.
- Ensure that all hazardous substances are securely and appropriately stored.

- Ensure that all control measures, for example, local exhaust ventilation such as fume cupboards, dust and fume extraction etc. are functioning adequately and that test records are up to date.
- Ensure that the appropriate Personal Protective Equipment (PPE) as identified in the risk assessment is available and that procedures for the care, maintenance and inspection of PPE are in place.
- Ensure that hazard data sheets and risk assessments are obtained for new substances prior to purchasing.
- Monitor compliance with risk assessments and re-assess when necessary.
- Ensure that appropriate emergency procedures are in place for managing any uncontrolled release of a hazardous substance e.g. spillages.
- Ensure that any hazardous substances which require disposal are disposed of safely by a licensed waste disposal contractor in compliance with environmental protection legislation and that appropriate waste transfer documentation is completed and filed.
- Be aware of any activity by contractors/visitors involving hazardous substances which may affect employees or non employees (pupils, clients etc).

## **2.2 Employees Must:**

- Read the label, and product safety data sheet, where it exists for any hazardous substance to which they or members of the public/clients are exposed.
- Read, and ensure they understand any risk assessment relating to any hazardous substances to which they or members of the public/clients are exposed.
- Use control measures correctly when required as identified in the risk assessment.
- Report promptly to their line manager any malfunctions or defects discovered in control measures or any hazardous substances for which there is no adequate assessment.

## **2.3 Contractors Working on County Council Sites (including Schools) Must:**

(This includes cleaning contractors etc.)

- Obtain product safety data sheets for any hazardous substances which they are using.

- Carry out risk assessments for any work activities involving hazardous substances on Council sites.
- Prepare written safe systems of work for the tasks carried out.
- Store hazardous substances securely when not in use.

This information should be available for inspection at the time the contract is arranged and copies kept in suitable places (e.g. cleaners storeroom/managers office).

Managers should ensure that this is the case at local level because of the potential risk to clients and employees from uncontrolled use of hazardous substances.

## **PART 2 TOOLKIT FOR IMPLEMENTING COSHH**

This toolkit details the actions needed to comply with the COSHH Regulations.

### **3.0 COUNTY COUNCIL PROCEDURES FOR HAZARDOUS SUBSTANCES**

Hazardous substances can cause serious harm to people if their use is not adequately controlled. A definition of what is a hazardous substance is given in Appendix 3.

Harm may be caused by

- a single exposure to a high concentration of a toxic substance (acute effects); or
- many exposures over a long period of time to low concentrations (chronic effects)

Hazardous substances may enter the body by

- Absorption through the skin and eyes
- Inhalation (breathing in)
- Ingestion (swallowing)

The following steps are required to ensure the risks from hazardous substances are adequately controlled

- Compile and maintain an inventory of substances
- Eliminate/substitute wherever possible
- Dispose of unwanted substances safely
- Obtain safety data sheets
- Carry out/obtain risk assessment – if necessary
- Implement the findings of the risk assessment

How these steps can be achieved is detailed below.

#### **3.1 Inventory**

An inventory should be kept of all hazardous substances present to which employees or non-employees may be exposed, the record form in Appendix 1 or similar should be used. Separate inventories for different work areas may be needed if large numbers of substances are in use. The inventory should indicate whether a risk assessment is required for the substance and the type/source of the assessment (see para 3.5).

A copy of the inventory should be kept readily available for employees and the emergency services to consult.

Quantities of hazardous substances on site should be kept to a minimum.

### 3.2 Elimination/Substitution of Hazardous Substances

As a general principle COSHH requires the elimination of hazardous substances from the workplace wherever possible. The hazardous substances inventory should be reviewed regularly to ensure it is up to date and also to check that the substances listed are still needed or if there is a less hazardous alternative.

A list of substances for which it is appropriate to use an alternative or for which restrictions for use apply can be found in Appendix 6.

### 3.3 Disposal of Unwanted Substances

Any unwanted substances should be disposed of responsibly. It is an offence under the Environmental Protection Act 1990 to dispose of certain substances illegally through the sewage system or with non-hazardous waste. **Under no circumstances** should hazardous substances be disposed of down sinks, toilets or drains.

Arrangements must be made for the disposal of relevant unwanted substances by contacting the councils appointed waste disposal contractor (currently Grundons). For details of the service see the Contracts and Services Directory.

The following advice must be followed when preparing substances for collection:

- Each item must be clearly labelled with the name of its contents and a label stating that it is awaiting disposal.
- Any item which cannot be identified must be labelled as "UNKNOWN SOLID" OR "UNKNOWN LIQUID".
- Substances awaiting disposal must be stored securely.
- Incompatible substances (substances which might react together) must be stored separately.

A record must be kept of any substances sent for disposal. Waste transfer notes should be obtained and kept for 3 years from the date of disposal.

### 3.4 Product Information - Materials Safety Data Sheets (Hazard Data Sheets)

Manufacturers and suppliers are required by law to provide material safety data sheets for all the hazardous substances they manufacture or supply. This must be obtained for all hazardous substances purchased for use by employees/clients.

The material safety data sheet provides:

- detailed information regarding the potential that the substance has to cause harm
- the information needed to make an assessment of the risk to health and safety which the substance presents when it is in use.

Many safety data sheets for cleaning and maintenance products are available on line through Hertfordshire supplies. It is recommended Hertfordshire Supplies products are used in preference to others as the health and safety information is readily available and is of a reasonable standard.

Safety data sheets can also be obtained direct from the appropriate manufacturer/supplier. See Appendix 3 for a sample letter requesting a safety data sheet. If you cannot obtain an adequate safety data sheet do not use that supplier.

**Note: The material safety data sheet is not in itself a risk assessment.**

### 3.5 Risk Assessment

The regulations only cover the use of hazardous substances in the workplace (see Appendix 3 for definition) there may also be a number of other substances in use which are not classified as hazardous to health.

The Health and Safety Executive have made a clear statement about substances in the workplace to which COSHH applies/does not apply.

‘For the vast majority of commercial chemicals, the presence (or not) of a warning label will indicate whether COSHH is relevant. For example, there is no warning label on ordinary household washing-up liquid, so if it’s used at work you do not have to worry about COSHH; but there is a warning label on bleach, and so COSHH does apply to its use in the workplace.’

Although there is no legal requirement to assess the risks from the use of ‘non hazardous’ substances Appendix 5 ‘General Precautions’ has been provided to give information about good practice as well as providing basic ‘starter’ information for any hazardous substance requiring a risk assessment..

Where substances create other risks as well as being a hazard to health, for example, are explosive or flammable, these risks also need to be assessed (Dangerous Substances and Explosive Atmospheres Regulations 2002) the two assessments can be combined if appropriate.

For any hazardous substance used, stored, generated or encountered a risk assessment **must** be done. This can be achieved in a number of ways –

- incorporation into a job or activity risk assessment
- adopting a generic assessment from a trade or professional body or similar source
- adopting a Hertfordshire Supplies generic assessment
- carrying out a separate COSHH Assessment.

Or by a combination of these as appropriate.

For more detailed information on each of these options see paras 3.5.1 – 3.5.5.

### **3.5.1 Job/Activity Risk Assessment**

Where the risk from hazardous substances is to employees, it should in many cases be possible to include an assessment of the risk in the general job risk assessment (see Section 2.1 BCC H&S Policies and Procedures or 2.1 of the Schools H&S Handbook for information about the job risk assessment process).

Where it is not appropriate to incorporate the COSHH assessment into a job risk assessment for example an activity carried out by non employees (e.g. pupil or client) it may be possible to incorporate the COSHH element of the assessment into an activity risk assessment.

Where this is not possible and a separate more detailed hazardous substance risk assessment is needed e.g. higher, more complex risk with detailed controls, the separate assessments must be cross referenced in the general job/activity risk assessment.

### **3.5.2 Trade and Professional Organisation Assessments**

A number of trade and professional organisations produce generic COSHH assessments for their members or specific groups, for example, CLEAPSS School Science Service produce generic COSHH assessments for school Science teaching activities (CLEAPSS Hazcards), and school Design and Technology activities; (CLEAPSS Model Risk Assessments in Technology). These include assessments which may have a wider application than just to science and technology e.g. certain cleaning activities and the use of adhesives.

These assessments can be used as long as they fulfil the requirements of the regulations and are checked and amended if necessary to ensure that they cover the particular uses/activities.

### **3.5.3 COSHH Assessments for Commonly Used Substances**

Hertfordshire Supplies produce generic assessments for groups of commonly used substances, which may be useful. These assessments are grouped by activity e.g.

- Glues, adhesives and resins
- Cleaning products, carpet cleaners
- Cleaning products – hardfloor strippers/floorsealers
- Cleaning products – toilet/ bathroom cleaners and descalers
- Kitchen products – dishwasher
- Kitchen products – oven/fryer cleaners
- Swimming pool maintenance products

These generic assessments are in the COSHH Guidance Booklet which can be downloaded from the Hertfordshire Supplies website [www.hertsdirect.org/supplies](http://www.hertsdirect.org/supplies) (you will need to know your on-line account number).

Please note that some of the Hertfordshire assessments include products which are not classified as hazardous to health, where none of the products you use are hazardous you do not need to use that assessment nor does it imply that you need to assess other similar non hazardous substances.

Once it has been decided which of the assessments are relevant they must be checked to ensure they cover the particular substance in use and that the control measures stated are adequate for the local circumstances. The separate COSHH assessments should be cross referenced in any relevant job risk assessments.

COSHH assessments in wipe clean, poster form are also available for purchase from Hertfordshire Supplies for kitchens, classroom/office and cleaning/maintenance.

#### **3.5.4 Risk Assessments not available from Above Sources**

Where a COSHH assessment is not available from the sources listed in 3.5.2 and 3.5.3 (this may apply particularly to hazardous substances which are not products such as dust and biological agents) managers will need to ensure that a competent person carries out a risk assessment.

Any person carrying out a COSHH assessment must have:

- Received training in COSHH risk assessment (half a day's training or equivalent). Training is available through the Health and Safety Team.
- and
- A reasonable knowledge and experience of the substances and procedures involved.

The findings of the risk assessment can either be incorporated into the job risk assessment (see section 2.1 BCC H&S Policies and Procedures or 2.1 of the

Schools H&S Handbook for information about the job risk assessment process) if appropriate or recorded on a separate form (a template for this is provided in Appendix 4).

Where a separate COSHH assessment has been obtained or produced this must be cross referenced in the relevant job risk assessments.

For further assistance contact your Health and Safety Adviser.

### 3.5.5 Specific Risk Information

Detailed information on particular hazardous substances or activities involving hazardous substances which will assist in the assessment process can be found in other sections of the Buckinghamshire County Council Health and Safety Policies and Procedures and the Schools' Health and Safety Handbook, as outlined below.

<b>Topic</b>	<b>BCC Policies and Procedures Reference</b>	<b>Schools H&amp;S Handbook Reference</b>	<b>Comments</b>
Latex	Section 11.2	Section 6.6	
Hepatitis B/HIV	Section 8.2	Section 8.1	
Storing and handling of cleaning materials	N/A	Section 5.14 Caretaking and Cleaning	Information should be used in conjunction with the generic assessments from Hertfordshire Supplies
Work Related Infectious Diseases (Weils Disease, Hepatitis A etc.)	Section 8.3	Section 8.8	
School Science (Secondary)		Section 9.1	General information on COSHH in science plus signposts to generic

			risk assessments
School Science (Primary)		Section 9.2	General information on COSHH in science plus signposts to generic risk assessments
School Design and Technology (Secondary)		Section 9.3	General information on COSHH in design and technology plus signposts to generic risk assessments
School Design and Technology (Primary)		Section 9.4	General information on COSHH in design and technology plus signposts to generic risk assessments
Art and Design in Schools (Secondary)		Section 9.5	General information on COSHH in art and design plus signposts to generic risk assessments. Some of the information may also be applicable to Primary Schools

## 4 USE OF COSHH ASSESSMENTS IN THE WORKPLACE

### 4.1 New or Revised Assessments

When the COSHH assessment has been received or completed:

- Check that it adequately covers the proposed uses and amend if necessary, in particular this will be needed where more than one substance is involved in an activity or where a substance is used in a number of different ways, for example, diluting, spraying and hand applying.
- Sign and date the assessment.
- Ensure employees are informed about the contents of the risk assessment and follow the control measures listed in the assessment and in the general precautions guide (Appendix 5).

### 4.2 Reviewing COSHH Assessments

COSHH assessments should be reviewed when there is a significant change in:

- the substances used or their source
- equipment used including engineering controls such as fume cupboards and dust extraction
- the method of working
- the quantity of material used or the rate at which it is used.

Whenever there is reason to suspect the assessment is no longer valid, for example:

- periodic examinations and tests of engineering controls
- monitoring exposure at the workplace
- health surveillance
- a confirmed case of an occupationally induced disease
- new information on health risks becomes available.

and in any case annually.

## **5.0 SUPPLEMENTARY INFORMATION**

This section gives additional information which will assist in the assessment and control of hazardous substances.

### **5.1 Control Measures**

Where it is not reasonably practicable to prevent exposure to a hazardous substance, control measures will be stated in the risk assessment to ensure that the risk is adequately controlled. General control measures applicable to all substances are given in Appendix 5.

Examples of control measures include, the use of equipment and systems of work which minimise the production of, or suppress and contain spills, leaks, dusts, fumes and vapours.

For example, the use of:

- fume cupboards
- dust extraction
- spray booths
- welding fume hoods
- personal protective equipment.

Limiting the quantities of hazardous substances stored at the establishment and ensuring safe storage, handling and disposal will also help to reduce the risk. For example, the use of:

- a secure cupboard for hazardous chemicals
- a purpose built flammable store or lockable metal cabinet
- appropriate equipment for transporting containers of substances such as bottle carriers
- limiting the number of people who might be exposed to a hazardous substance
- prohibiting eating, drinking and smoking in areas in which hazardous substances are used or stored
- adequate cleaning of walls and floors and high level cleaning, for example, in areas such as workshops, pottery studios, etc. which are prone to the accumulation of dusts
- personal washing and drying facilities e.g. where there is a risk of infection or dermatitis
- appropriate hazard warning signs on cabinets and cupboards where hazardous substances are stored. If labelling an external store may increase the risk of vandalism use a Hazchem type sign.

## 5.2 Maintenance of Control Measures

Engineering control measures such as fume cupboards, dust and fume extraction, spray booths etc. must be regularly inspected and maintained by a competent person.

All engineering controls must be visually inspected weekly. In addition all local exhaust ventilation required for health and safety reasons must be regularly inspected tested at least once every 14 months by a competent person, (this will usually be carried out annually by a competent contractor) records of the tests must be kept for 5 years.

## 5.3 Personal Protective Equipment

Personal Protective Equipment (PPE) includes:

- eye and face protection, for example, goggles and face visors
- protective clothing, for example, laboratory coats, overalls and aprons
- protective gloves and gauntlets, for example, made of rubber, PVC, nitrile, etc
- respiratory protective equipment (RPE), for example, dustmasks, half and full face respirators

The need for PPE must be identified from the risk assessment however the use of engineering and other control measures must **always** take precedence over the use of PPE. This is because it protects a larger number of persons than PPE which only protects the wearer. In some cases both the use of an engineering control measure and PPE will be necessary, for example, when carrying out a demonstration in a fume cupboard in a school science laboratory.

Should the risk assessment identify that PPE is required then the assessment must include details of the PPE needed to ensure it protects against the particular risk e.g. the types of eye protection needed to protect against chemical splashes, impact from flying objects, radiant heat or light are all very different and it is not sufficient in the risk assessment to say 'wear eye protection'.

Employees must wear personal protective equipment if it is specified in the risk assessment.

All PPE must be appropriately stored, regularly inspected, cleaned and maintained or be replaced when necessary.

See Section 11.0 in the Health and Safety Policies and Procedures or Section 6.5 Schools H&S Handbook for further information on PPE.

#### **5.4 Other Specialist Training**

Training may be required before hazardous substances are used for example, dealing with spillages or other uncontrolled release and in the use of personal protective equipment.

No employee can be required to wear any respiratory protective equipment unless adequately trained in its use.

#### **5.5 Environmental Monitoring**

Where there is a suspicion that exposure to a substance hazardous to health may be approaching harmful levels or where the adequacy of existing control measures is questioned a one-off monitoring exercise may be necessary.

For example this may occur in the following situations

- dust in areas used for ceramics or woodwork where these areas have re-circulating heating systems
- solvent vapour produced in reprographic areas with poor natural ventilation.

The Health and Safety Team can arrange for environmental monitoring if required (there is a charge for this).

#### **5.6 Health Surveillance**

The COSHH Regulations require health surveillance in some circumstances.

Health surveillance is required where you answer 'yes' to all the following:

- Is the work known to damage health in some particular way? For example exposure to wood dust, solder/colophony, isocyanates.
- Are there valid ways to detect the disease or condition?
- Is it reasonably likely that damage to health may occur under the particular conditions at work?
- Is surveillance likely to benefit the employee?

For example, frequent exposure to high levels of wood dust may cause occupational asthma. There is a valid technique that can detect for asthma. Carrying out these tests will benefit employees by identifying those at risk so that measures can be taken to protect them and improve working conditions.

It may also be appropriate to assess employees' immunity before or after vaccination to ensure adequate protection from biological agents, for example, Hepatitis B.

There are very few instances where this would be required for County Council employees and it will normally have been identified by your Health and Safety Adviser. Contact your Health and Safety Adviser for more information.

## **5.7 Emergency Procedures/First Aid**

Special procedures may be required for managing any uncontrolled release of a hazardous substance which could result in exposure well beyond that associated with day to day activities, for example, spillages, sudden failure of extraction ventilation or during a fire or flood and for personal exposure requiring first aid treatment.

This could include:

- availability of information on the specific hazards likely to arise in certain circumstances, for example, during a fire or accidental mixing of substances
- practice of emergency procedures
- information and training for employees in the special procedures
- first aid facilities and arrangements
- information for emergency services
- procedures for clearing up and safe disposal, for example, availability of a suitable spillage kit

It may be necessary for first aiders to receive special training in dealing with exposure to particular hazardous substances. Access to first aid assistance and equipment should be considered including a reliable, suitable water supply for skin and eye irrigation.

## 6.0 FURTHER INFORMATION

For further information contact your Health and Safety Adviser

### HSE Information

There are a large number of COSHH related publications some may be available from your H&S Adviser, others are free to download from the HSE website [www.hse.gov.uk/coshh](http://www.hse.gov.uk/coshh)

Paid publications and free leaflets are also available from: HSE Books, PO Box 1999, Sudbury, Suffolk, CO10 6FS. Telephone (01787) 881165, Fax (01787) 313995, [www.hsebooks.co.uk](http://www.hsebooks.co.uk).

A selection of relevant COSHH publications are listed below

Control of Substances Hazardous to Health (fifth edition) – Regulations, Approved Code of Practice and Guidance L5 ISBN 0 7176 2534

COSHH: a brief guide to the regulations INDG136rev3 –free leaflet

Respiratory protective equipment at work: a practical guide (third edition) HSG 53

A step-by-step guide to COSHH assessment HSG 97 (second edition)

COSHH Essentials: [www.coshh-essentials.org.uk](http://www.coshh-essentials.org.uk)

Why do I need a safety data sheet? INDG353 (free)

Read the Label INDG352 (free)

Selecting protective gloves for work with chemicals, INDG330 (free)

Working Safely with Solvents INDG273 (free)

Workplace Exposure Limits EH40 - lists current workplace exposure limits

Controlling Airborne Contaminants at Work HSG 258

Clearing the Air INDG 408 – Employers guide to LEV (free to download)

Time to Clear the Air INDG 409 – Employees guide to LEV (free to download)

## **CLEAPSS**

### **Science**

CLEAPSS - Hazcards

CLEAPSS – Science Publications – on CD

### **Design and Technology**

CLEAPSS – Design and Technology – on CD

CLEAPSS Model Risk Assessments in Technology on CD