Greenfield Primary School
Control of Substances Hazardous to Health (COSHH) POLICY
2016-17

Approved by Governors (date) .....

Signed on behalf of the Governing Body .....

Chair of Governors

Leicestershire County Council

Operational Policy & Guidance

Control of Substances Hazardous to Health

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2015

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1.0 Introduction

1.1 The Control of Substances Hazardous to Health (COSHH) Regulations 2002 provides the legal framework to protect people against health risks from hazardous substances at work. The regulations require employers to adequately assess the risk to health arising from work activities, to control exposure to hazardous substances and to protect both staff and others, who may be exposed, including the environment.

1.2 The term hazardous substance describes a wide range of substances with the potential to cause harm if they are inhaled, ingested, injected or absorbed through the skin or released into the environment. Common substances such as cleaning materials, herbicides and pesticides can be hazardous and/or harmful to the environment.

1.3 Hazardous substances occur in the following forms from packaged item or work process:

- Substances or a mixture of substances classified as dangerous which carry warnings such as Toxic, Very Toxic, Harmful, Corrosive, Irritant, Sensitising or Carcinogenic.
- Substances with Workplace Exposure Limits (WEL's). Workplace Exposure Limits have replaced the Maximum Exposure Limit (MEL) and Occupational Exposure Standard (OES). Substances with Well's are listed in HSE guidance EH40.
- Biological agents (bacteria, viruses and other micro-organisms)
- Any kind of dust in a specific concentration.
- Any other substances which create a risk to health, e.g. liquids, vapours, gases, mist, fibres, solids or smoke.

Some substances are excluded from the COSHH regulations but are covered by their own specific regulations. These include:

- Radioactive materials
- Asbestos
- Lead and lead products
- Material hazardous due to flammability only (these fall under Dangerous Substances and Explosive Atmosphere Regulations (DSEAR)
- Substances used for medical treatment.

1.4 The purpose of this procedure is to detail how substances hazardous to health will be controlled within Leicestershire County Council. This procedure has been prepared to assist members of staff manage substances hazardous to health, work safely, and prevent accidents and injuries.

2.0 Organisation

2.1 The responsible person(s) for Health and Safety will:

- Identify the hazardous substances used on site/facility/establishment,
- Determine the risks from using any substances and implement suitable controls at each stage of the process.
- Considering whether the substances are definitely needed or whether a safer substance could be used,
- Undertaking risk assessments to account for all working practices in the site/facility/establishment in which the hazardous exposure may occur,
- Prevent people being exposed to hazardous substances, but where this is not possible, controlling the exposure,
- Restricting the use of hazardous substances to nominated staff,
- Deciding what precautions are needed before starting work with a hazardous substance,
- Communicate COSHH risk assessments with those affected by their findings,
- Arrange health surveillance as required in conjunction with managers and health and safety staff,
- Keep all health surveillance records for a minimum of 40 years from date of last entry,
- Allow employees to have access to their own health records,
- Liaise with health and safety staff as required.

2.2 All members of staff that come into contact with hazardous substances have the following responsibilities:-

- Familiarising themselves with the relevant COSHH risk assessments, data sheets and relevant policies,
- Attending instruction and training in the use of/contact with substances,

- Reporting any health symptoms arising from their work material to their line manager, e.g. skin irritation, breathing problems,
- Using all control measures (i.e. ventilation, PPE) provided in the manner shown in their training. Following recommended dilution rate and not decanting where possible,
- Wearing/storing appropriate PPE if provided, as designed, including carrying out maintenance and cleaning as required,
- Reporting any defects in PPE provided to supervisors, line manager or managers,
- Assisting in the compilation of risk assessment (where required),
- Making themselves available for any health or medical surveillance deemed necessary in relation to the substances,
- Ensuring good standards of hygiene.

3.0 Controlling Substances Hazardous to Health

Within a service or establishment substances hazardous to health are controlled in a variety of ways.

3.1 Identifying Hazards to Health

The title(s) of responsible person(s) within each service or establishment will ensure that an inventory of substances used within the site/facility/establishment is maintained. All substances purchased and used by the site/facility/establishment will be included in this inventory. The following details will be included in the inventory:

- Trade name of product
- Name and contact details of supplier
- Amount bought per annum
- Any hazard classification labelling
- Intended use

The responsible person shall ensure any new product ordered comes with its Safety Data Sheet (SDS). Note: A Safety Data Sheet is not a risk assessment.

3.2 Risk Assessment

A COSHH assessment is an assessment of risk and control measures to members of staff and others affected by the substance. A COSHH assessment will be completed for all activities involving hazardous substances.

The COSHH risk assessment will be completed by using the following method:

- **Activity/Task** - Give a brief description of the process or activity. The whole process shall be assessed, not the individual substances. The checklist in ***appendix 1*** of this procedure will help identify the hazards. This should be done by using the Safety Data Sheet.

    - It is important to consider each stage / step of the task / activity and not just the end use. Where necessary additional assessments should be made and the following considered; storage of bulk chemicals and bunding, how chemicals arrive on site / delivery arrangements, decanting of chemicals into smaller vessels, emergency procedures in the event of spillage, the storage of other chemicals, unauthorised access to chemical store – this list is not exhaustive and will require sites to consider risks specific to them.

- **Activity Hazards** – All known hazards from the process and hazardous substances associated with the task will be listed, including the risks from mixing substances and any dust / fumes produced as part of the process. The Hazard Identification Form at the back of this guidance may help you with this part of the risk assessment.

- **Possible Exposure** – List of those that may be exposed to the risks involved in the process or use of hazardous substance or material.

- **Existing Controls** - The control measures currently in place to reduce exposure to the hazardous substances will be considered here. This will include PPE, ventilation, providing information, instruction and training, safe systems of work etc. Emergency procedures will also be considered.

- **Assessment of Risk *(Risk Rating)*** – The assessor will make a judgement taking into account all factors and deciding on whether the remaining risk is high, medium or low, by using the matrix within the risk assessment.

- **Further Control Measures** – If additional controls can be introduced to eliminate or reduce exposure still further, the details will be listed here and the risk assessment process should be repeated once these measures are in place.

If a COSHH risk assessment is required, this must be undertaken by a manager/ supervisor together with someone who is familiar with the systems of work within the area being assessed. Copies of the assessment must be readily available so that in the event of an incident, the correct emergency action or first aid measures can be taken.
New or expectant mothers will receive a documented individual risk assessment considering all the hazards associated with activities undertaken. Where applicable advice on using substances will be sought and included in the risk assessment as the mother or unborn child may be at risk.

Remember that hazards and risks are not limited to substances labelled as 'hazardous'.

3.3 Control Measures

An important part of the process of COSHH risk assessment is the identification of effective control measures. All control measures must perform as intended and continue to prevent or adequately control the exposure to substances hazardous to health. If controls are found to be inadequate and therefore could result in reduced efficiency, effectiveness or levels of protection for staff. The following is the hierarchy of control measures which will be considered.

- ***Elimination*** – does the substance have to be used? If not, it should be disposed of correctly; if necessary seek advice from supplier
- ***Substitution*** – could another (less hazardous) substance be used instead?
- ***Reduction*** – can reduced amounts be used?
- ***Isolation/Enclosure*** – e.g. redesigning the working environment to contain the substance
- ***LEV/General Ventilation*** – e.g. fume cupboard or just opening window and doors to cause natural ventilation.
- ***Safe Systems of Work*** – staff to be aware of procedures for using substance safely and protecting themselves in normal and emergency circumstances. Safe systems of work may specify the need to limit the length of exposure or just good standards of hygiene housekeeping – e.g. staff to be responsible for putting away substance after use.
- ***Information/Instruction*** – training must be given to staff and others (e.g. contractors, visitors) on the substances, the risks, the methods of control, any personal protective equipment (PPE) required and emergency measures.
- ***Supervision*** – staff to be supervised in their work activities to ensure that they are following safe systems of work and are applying the training received.
- ***PPE*** – this is provided as a last resort because it only protects the individual wearing it. It must be suitable for the task and conditions. If PPE is provided it must be worn in the manner it is designed for. The risk assessment should identify the PPE required.

3.4 Storage

- Stocks of substances will be kept to a minimum, used in date order and within expiry date.

- Substances will be stored and labelled correctly in accordance with manufacturer's instructions. Appropriate hazard signs will be provided on all storage areas/cupboards where a risk has been identified.

- Substances will be disposed correctly e.g. hazardous waste, recycling of containers as indicated on the SDS.

3.5 Maintenance

It is essential that control measures are kept in good working order. The responsible person will ensure that any local exhaust ventilation system (LEV) is thoroughly examined at least once every 14 months and dated and signed records kept. Records should be kept for at least five years.

3.6 Information, Instruction and Training

Members of staff responsible for undertaking a COSHH assessment will receive suitable and sufficient training. This training shall be repeated periodically .e.g. every 3 years.

All employees who work with substances hazardous to health shall receive suitable and sufficient information, training and instruction. This includes cleaning and maintenance staff and temporary or agency staff. The minimum requirement is for them to understand the outcome of the risk assessments and what this means for them. They should understand:

- what the hazards and risks are;
- about any workplace exposure limit;
- the results of any monitoring of exposure;
- the general results of health surveillance;
- what to do if there is an accident (e.g. spillage) or emergency.

Employees will have access to safety data sheets. Training records will be maintained on site.

Contractors will be made aware of substances hazardous to health stored on site, what the risks are and how they are controlled. The responsible person will ask contractors if they are bringing hazardous substances onto the premises, and how they will prevent harm to staff.

3.7 Health Surveillance

Health surveillance is any activity which involves obtaining information about employees' health and which helps protect employees from health risks at work. Where health surveillance is necessary the responsible person shall

arrange it to be carried out in the form of suitable tests, questionnaires and examinations. Results will be interpreted by a competent person and action taken to eliminate or further control exposure.

The responsible person will report any work related disease to the HSE when they receive a written diagnosis from a doctor that they or their employee is suffering from an occupational disease listed in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, and the sufferer has been doing the work activities listed in the Regulations.

3.8 Planning for emergencies

In the event of an emergency involving a hazardous substance, the responsible person must take immediate steps to:

- Assess the situation
- Make the area safe
- Contact the first aider (if required)
- Minimise the effect of the event
- Inform any staff who may be affected
- Restrict access to the affected area to essential personnel only and provide with the necessary PPE until the situation returns to normal

Where necessary details of emergency procedures, including a spills procedure, must be documented, communicated to staff, displayed in the workplace. In addition it should be tested, reviewed and revised periodically. A log of emergency situations and near misses will be kept at the site/facility/establishment.

3.9 Monitoring and Review

The responsible person(s) will ensure that risk assessments are undertaken and the assessments are kept up to date and reviewed:

- When there has been a change in work procedure
- If the substance is used for a different task
- If a substance has changed, e.g. new safety data sheet received
- Upon HSE direction
- Following any adverse incident involving the substance or task.

A new Safety Data Sheet should be gained when the risk assessment is reviewed. COSHH Risk Assessments should be kept for three years and must be available for inspection as part of annual inspections and audits.

COSHH Assessment Form

This document **MUST** be retained for a minimum of **40 years.**

Leicestershire County Council

Before beginning work on the COSHH assessment process ensure you have a copy of the latest Safety Data Sheet (SDS) for the substance. SDS's are available from suppliers and manufacturers of your products.

Name of Substance	

Indicate below which form the substance takes:
Consideration to be made when using in different forms e.g. liquid to mist from spray bottle or fuel(liquid) to vapour

☐ Gas ☐ Vapour ☐ Mist ☐ Fume ☐ Dust ☐ Liquid ☐ Solid ☐ Other State

Classification (place an x in the box next to the appropriate sign):
For a fuller understanding of symbols, abbreviations, risk and safety phrases click on this link http://www.hse.gov.uk/coshh/detail/coshh-clp-reach.htm

 Acute Toxicity ☐	 Health hazard ☐	 Flammable ☐
 Corrosive ☐	 Serious long term health hazard ☐	 Hazardous to the environment ☐
 Explosive ☐	 Oxidising ☐	 Gases under pressure ☐

Can you eliminate the use of this hazardous substance? If Yes, stop the use of the substance and arrange for adequate disposal.	Yes ☐	No ☐
Is it possible to use a less harmful substance to do the work? (Contact your supplier for more information). If Yes, ensure a COSHH risk assessment is completed for the new substance.	Yes ☐	No ☐

Describe the activity or work process:		How long?	How often?	How much?
Note: Include how long the task will take, how often it will be repeated and how much of the substance is used.				
Department & Location(s) of work process:				

Persons at risk:	Employees ☐	Pupils ☐	Vulnerable Persons ☐	Other e.g. members of public ☐

Indicate below which route(s) of exposure the substance takes:
Inhalation ☐ Skin ☐ Eyes ☐ Ingestion ☐ Other? ☐ (Please state) _____

Workplace Exposure Limits (WELs)

Long-term exposure level (8hr TWA):	Short-term exposure level (15 mins):

List the risks to health and all known hazards below from exposure to the substance. Click here for risk phrases http://www.hse.gov.uk/chip/phrases.htm

Control Measures: List below control measures e.g. extraction, ventilation, supervision, include additonal controls for vulnerable persons where necessary.	
	NOTE : Certain substances can react adversely when they come into contact with others, please list any compatibility warnings here:

Is health surveillance or monitoring required? (remember health surveillance may be required for vulnerable persons e.g. pregnant/young workers those with asthma, dermatitis etc.) **If Yes, please notify your manager.**	Yes ☐	No ☐

Personal Protective Equipment identify type and specification:

 ☐ Dust mask		 ☐ Visor	
 ☐ Respirator		 ☐ Goggles	
 ☐ Gloves		 ☐ Overalls	
 ☐ Footwear		 ☐ Other	

First Aid Measures (please give details below):

Inhalation:	Ingestion:
Skin Contact:	Eye Contact:

Fire; identify appropriate fire extinguishers, fire fighting Media and measures to contain/extingusih a fire?	During combustion substances may give rise to harmfull vapours / gases etc please detail below;
Dry Powder ☐ CO2 ☐ Water ☐ Foam ☐ Fire Blanket ☐	

Storage; how and where should items be stored?

Disposal of waste substances & containers please indicate below

Hazardous Waste ☐ General Waste ☐ Biological Waste ☐ Return to Supplier ☐ Other ☐

What is the process of disposing the waste?

Is exposure adequately controlled? If No, stop the use of the substance and contact your manager.	Yes ☐	No ☐

Risk Assessor(s) Name(s):		Risk Assessor(s) Signature(s):	
Authorised By:		Authoriser Signature:	
Date Conducted:		Date Review Required:	Date of Last Review:
		Date Review Required:	Date of Last Review:
		Date Review Required:	Date of Last Review:

A

Inventory of Substances Template

Product List – Establishment				**Appendix 2**	
Substance/Trade name of product	**Name and address of supplier**	**Amount bought per annum**	**Hazard classification labelling**	**Intended use**	**Other information**

Safety data sheets

European symbols

New International symbols

Products you use may be 'dangerous for supply'. If so, they will have a label that has one or more hazard symbols.

These products include common substances in everyday use such as paint, bleach, solvent or fillers. When a product is 'dangerous for supply', by law, the supplier must provide you with a safety data sheet. Note: medicines, pesticides and cosmetic products have different legislation and don't have a safety data sheet. Ask the supplier how the product can be used safely.

Safety data sheets can be hard to understand, with little information on measures for control. However, to find out about health risks and emergency situations, concentrate on:

- Part 15 of the sheet, which tells you what the dangers are;
- Parts 4 to 8, which tell you about emergencies, storage and handling.

International symbols will replace the European symbols in 2009. Some of them are similar to the European symbols but there is no single word describing the hazard. Read the hazard statement on the packaging and the safety data sheet from the supplier.

For further guidance on International symbols follow the below link:

http://www.hse.gov.uk/ghs/implications.htm

A

GHS hazard pictograms