

# Health & Safety Policy

## HSP 8

### Control of Substances Hazardous to Health (COSHH)

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Key Document details:

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| <b>Title:</b>       | HSP 08 – Control of Substances Hazardous to Health (COSHH)   |
| <b>Author(s):</b>   | David Maine  |
| <b>Date:</b>        | September 2020   |
| <b>Review date:</b> | September 2022   |
| <b>Application:</b> | This policy applies equally to all The White Horse Federation (TWHF) employees including agency or casual staff, and to all premises where TWHF is either the 'employer' or is in control of the premises.<br>The Control of Substances Hazardous to Health regulations 2002 (as amended) places a duty on TWHF to control substances hazardous to health. |

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| <b>Definitions</b>    | For the purpose of this policy, the following definitions apply;   |  |
|                       | Substance  | A natural or artificial substance whether in solid or liquid form or in the form of a gas or vapour (including micro-organisms).<br><br>Substances can take many forms and include: <ul style="list-style-type: none"> <li>• chemicals</li> <li>• products containing chemicals</li> <li>• fumes</li> <li>• dusts</li> <li>• vapours</li> <li>• mists</li> <li>• nanotechnology</li> <li>• gases and asphyxiating gases and biological agents (germs).</li> <li>• germs that cause diseases such as leptospirosis or legionnaires disease and germs used in laboratories.</li> </ul> |
|                       | Hazardous Substance  | Substances hazardous to health are defined under COSHH as those that are: 'Very Toxic, Toxic, Corrosive, Harmful or Irritant.' They include all substances allocated a Workplace Exposure Limit (WEL) in EH40, substantial quantities of dust and certain biological agents connected with work.   |
|                       | Workplace Exposure Limit (WEL)   | "Workplace exposure limit" for a substance hazardous to health means the exposure limit approved by the Health and Safety Executive for that substance in relation to the specified reference period when calculated by a method approved by the Health and Safety Executive, as contained in HSE publication "EH/40 Workplace Exposure Limits 2005" as updated from time to time.   |
| <b>Policy Aims</b>    | To ensure that adequate arrangements are put in place to enable TWHF to identify and assess risks arising from hazardous substances with the ultimate aim of protecting TWHF employees and others from hazardous substances at work.                                       |  |
| <b>Policy</b>         | It is the policy of TWHF to comply with the Control of Substances Hazardous to Health Regulations 2002 (as amended).   |  |
| <b>Risk</b>           | Exposure to hazardous substances with the potential to cause deleterious effects to the health of TWHF employees and others.   |  |
| <b>Responsibility</b> | The Chief Executive Officer (CEO) is considered to be the duty holder. The duty to manage COSHH within TWHF has been delegated by the CEO to the Director of Estates and Facilities. This responsibility is discharged primarily at the line management/operational level. |  |

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|           | <p><b>Roles &amp; Responsibilities</b></p>  |
| <p>I.</p> | <p>Roles and responsibilities are defined in HSP 2 Organisation.</p> <p>Any specific actions are detailed in the arrangements section below.</p>  |
|           | <p><b>Arrangements</b></p>  |
| <p>I.</p> | <p><b>Risk Assessment</b></p> <p>THWF must not carry out any work which can expose any of their employees to any substance hazardous to health until:</p> <ul style="list-style-type: none"> <li>• a suitable and sufficient assessment of the risks to employees health created by that work has been carried out and;</li> <li>• the steps needed reduce the risk and to comply with the regulations have been identified and;</li> <li>• those steps have been put into operation.</li> </ul> <p>The main aim is to eliminate the use of a harmful substance. However, if this is not possible a full assessment needs to be conducted with reference to the hierarchy of controls. It is not deemed acceptable to just provide employees with personal protective equipment without first examining other options of control such as substituting a substance for a safer alternative.</p> <p>When undertaking the assessment, consideration should be given to:</p> <ul style="list-style-type: none"> <li>• the hazardous properties of the substance</li> <li>• information on health effects provided by the supplier (data sheet)</li> <li>• the level, type and duration of exposure</li> <li>• the circumstances of the work, including the quantity used</li> <li>• activities such as maintenance where there is the potential for a high level of exposure</li> <li>• any relevant Workplace Exposure Limit</li> <li>• the effects of preventive and control measure which have been or will be taken</li> <li>• the results of relevant health surveillance</li> <li>• the results of monitoring of exposure</li> <li>• the risk presented by exposure to a combination of substances</li> </ul> <p>The COSHH assessment form HSF 8.1 is provided to assist with meeting these requirements. However, the COSHH assessor must be competent in the assessment process.</p> <p>Premises COSHH assessments will normally be carried out by the Site Manager.</p> <p>Teaching COSHH assessments will normally be carried out by the Principal or department lead, or will be covered by CLEAPPS HAZ cards</p> <p>Externally contracted cleaning or catering staff will be provided COSHH information by their employer.</p> <p>Any contractors working on site must provide their own COSHH assessments and Safe Systems of Work prior to any work commencing.</p> <p>Where assistance is required, the Health and Safety Manager and Facilities should be contacted for training or guidance.</p> |

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|    | <p>An umbrella COSHH risk assessment will also be conducted at each site to identify and control the general use and storage of chemicals. COSHH Risk Assessment GRA 8.1 is provided as a template for this process.</p> <p>All COSHH risk assessments will be reviewed annually.</p>  |
| 2. | <p><b>Prevent or adequately control exposure to hazardous substances</b></p> <p>TWHF managers are required to ensure that the exposure of their employees to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled.</p> <p>In practice, this should be achieved by considering implementation of control measures in the following sequence:</p> <ol style="list-style-type: none"> <li>I. Eliminating the use or production of hazardous substances in the workplace, e.g., changing the method of work to remove the use of the hazardous substance.</li> <li>II. Reducing the exposure to the hazardous substance, i.e., using a different form of the substance for example using a pellet form of a substance rather than a powdered form.</li> <li>III. Control of all routes of exposure where it is not reasonably practicable to prevent exposure to hazardous substances, for example, the use of engineering controls such as local exhaust ventilation (LEV).</li> <li>IV. Apply the principles of good practice for the control of exposure to substances hazardous to health as set out in Schedule 2A of the COSHH regulations 2002 (as amended).</li> <li>V. Ensure that any Workplace Exposure Limit (WEL) approved for a hazardous substance is not exceeded.</li> <li>VI. Ensure PPE is used as directed in the relevant risk assessment. This is the last line of defence.</li> </ol> |
| 3. | <p><b>Implement and maintain control measures</b></p> <p>Where control measures have been identified by the COSHH assessment, THWF will ensure that the control measures, including PPE and any other item or facility, are properly applied or used and are not made less effective by other work practices or by improper use.</p> <p>Managers should ensure that there are suitable supervision checks in place to ensure that defined safe systems of work are being followed, that PPE is being worn correctly and that suitable checks are being carried out on controls measures to ensure their effectiveness; for example inspection and statutory testing of local exhaust ventilation.</p> <p>All safety equipment including PPE must be CE rated and used in accordance with the manufactures instructions. See HSP 23</p>   |
| 4. | <p><b>Monitoring of Exposure</b></p> <p>Where the COSHH assessment identifies the need for monitoring to control exposure to hazardous substances, managers will ensure that suitable techniques are utilised to assess the extent of employees' exposure to substances hazardous to health via all routes of entry (inhalation, ingestion and/or skin).</p> <p>Examples of such techniques are monitoring the air in the employee's breathing zone, background air monitoring, or wipe sampling of the skin.</p>  |

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|    | <p>Records of exposure monitoring should be kept for a period of 40 years if they contain personal exposure monitoring data of an employee. All other exposure monitoring records should be kept for a period of 5 years.</p> <p>Less formal monitoring includes employees checking themselves for signs or symptoms of ill health and reporting these to their Line Manager so that appropriate action can be taken.</p>  |
| 5. | <p><b>Information, instruction and training</b></p> <p>Where employees are exposed to or work directly with substances hazardous to health, their manager must ensure that they receive appropriate information, instruction and training to work safely. Explain to employees what the dangers are associated with the work and do not merely rely on handing them written information and instructions.</p> <p>This can be provided in many ways; however the following measures should be considered:</p> <ul style="list-style-type: none"> <li>• COSHH assessment training</li> <li>• COSHH toolbox talks</li> <li>• Demonstration in the use of control measures and how to check whether they are working</li> <li>• Demonstration in the use of emergency arrangements and protocols such as emergency showers, eye baths, spill kit use etc.</li> <li>• Training into the use of personal protective equipment required for the work, e.g. gloves, local exhaust ventilation (LEV), face masks, respirators etc.</li> </ul> |
| 6. | <p><b>Arrangements to deal with accidents and emergencies</b></p> <p>In addition to the arrangements in place for fire emergencies and first aid, Managers must assess the risk associated with hazardous substances their employees are exposed to and implement suitable and sufficient procedures to protect their employees.</p> <p>For example, exposure to one or more hazardous substance on a scale, or to an extent, well beyond that associated with normal day-to-day activity such as a serious spillage or flood of a corrosive agent liable to make contact with employees' skin.</p>  |
| 7. | <p><b>Limitations of this Policy</b></p> <p>The policy cannot anticipate all eventualities; therefore professional judgement should be used to identify the appropriate course of action needed to protect those who are vulnerable and/or at risk. This judgement should derive from multi-disciplinary team discussion rather than any one individual where possible.</p>  |
| 8. | <p><b>Appendices</b></p> <ol style="list-style-type: none"> <li>1. HSF 8.1 COSHH Assessment Form</li> <li>2. HSF 8.2 COSHH Chemical Register</li> <li>3. GRA 8.1 COSHH Risk Assessment</li> <li>4. HSG 8.1 Safe Storage &amp; Disposal of Hazardous Materials &amp; Chemicals</li> </ol>   |

| Date           | Issue | Section | Changes                              |
|----------------|-------|---------|--------------------------------------|
| September 2020 | 1.4   | I       | Reviewing COSHH assessments Annually |
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