

Control of Substances Hazardous to Health

Safety Guidance Document



EAST RIDING

OF YORKSHIRE COUNCIL

Lead Directorate and Service:	Corporate Resources - Human Resources, Safety Services
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May 2012	May 2014	Reviewed to reflect change from Sypol COSHH Database to Sevron COSHH 365 Database.
December 2013	May 2014	Reference to Arvato services removed.
May 2014	October 2018	Reference to Euro CLP Regulations.
October 2018		Major re-write to increase reader understanding.

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Control of Substances Hazardous to Health

1. Background

Working with, or being exposed to, hazardous substances at work can put people's health at risk. This safety guidance document on the Control of Substances Hazardous to Health (COSHH) Regulations 2002 provides managers with appropriate information to ensure that the hazards are assessed and suitable control mechanisms put into place to prevent harm.

2. Foreword

In accordance with the Council's Corporate Health and Safety Policy, the Council is committed to pursuing continual improvements in Health and Safety. This safety guidance document supports this commitment and forms part of the Council's Health and Safety Management System.

3. Implementation

Directorates are responsible for the implementation of this safety guidance document and communication of its content, as appropriate.

This safety guidance document is available on the Safety Services Intranet Page and, where employees do not have access to the Council's intranet, via their Line Manager/Headteacher.

The Council relies on the co-operation of all employees and trades unions for the successful implementation of this safety guidance document.

A review of this safety guidance document will be undertaken three years after its implementation and where significant

changes in legislation or working practices deem this appropriate.

4. Roles and Responsibilities

Directors and Heads of Service

Directors and Heads of Services are ultimately responsible and accountable to the Chief Executive for ensuring this safety guidance document is issued to their management team.

Managers and Headteachers

Managers and Headteachers are responsible for achieving the objectives of this safety guidance document where relevant to their area of service delivery and are responsible for ensuring that:

- the information contained within this safety guidance document is implemented and complied with;
- competent persons will be appointed to carry out COSHH risk assessments of the exposure to substances hazardous to health and advise on their control;
- such assessments should form part of an overall assessment of the task(s) within which the hazardous substances are used, encountered or generated as a byproduct of the operation and the appropriate control measures embedded within the safe system of work;
- all operations which involve, or may involve, exposure to substances hazardous to health will be assessed and appropriate control measures will be taken if elimination or substitution of the substance is not possible;
- engineering controls (eg local exhaust ventilation, general ventilation, water suppression systems on cut off saws)

will be properly maintained and monitored by planned preventive maintenance and, if necessary, by annual performance monitoring to ensure continued effectiveness;

- all employees and others who may work in the affected areas will be informed of the purpose and safe operation of all engineering controls;
 - the type and use of personal protective equipment (PPE) will be carefully assessed and maintained according to manufacturers' instructions;
 - each assessment will be reviewed periodically or whenever there are any significant changes;
 - health surveillance is carried out where indicated to be necessary by the assessment and records kept for a minimum of 40 years;
 - relevant information, instruction and training is provided to staff to enable them to undertake their job safely and without risk;
 - adequate PPE is provided and staff are suitably trained in its use, testing, maintenance and storage arrangements.
- co-operate to enable their Manager/Headteacher to formulate and implement effective management systems;
 - co-operate to enable their Manager/Headteacher to comply with the Control of Substances Hazardous to Health Regulations;
 - make proper use of control measures, including PPE;
 - clean, disinfect, maintain and store personal PPE in accordance with the manufacturer's instructions or training;
 - return equipment, PPE and substances after use to their appropriate storage places;
 - report any defects found in the equipment;
 - attend required health surveillance appointments at the arranged time and give any information about their health as may be reasonable;
 - report any accident or incident which could have resulted in the release of a biological agent¹ into the workplace and which could cause severe human disease;
 - take care of their own health and safety and that of others are not put at risk by their actions.

Employees

Employees must ensure they carry out assigned tasks and duties in accordance with information, instruction, training and agreed safe systems of work. Specifically they must ensure that they:

- comply with this safety guidance document;
- participate in the completion and review of risk assessments;

Safety Services

The primary function of Safety Services is to support the Council and its employees by providing professional, authoritative, impartial advice on all aspects of health, safety and wellbeing. Where Managers/Headteachers require further assistance, Safety Services will advise on

¹ See Section 5 on page three

achieving compliance with this safety guidance document.

5. What is COSHH?

COSHH is the law that requires employers to control substances that are hazardous to health.

You can stop harm to employees by preventing or reducing workers exposure to hazardous substances by:

- finding out what health hazards there are in the workplace and during the tasks that are undertaken;
- deciding how to prevent harm by carrying out a risk assessment;
- providing control measures to reduce the harm to health;
- making sure they are used;
- keeping all control measures in good working order;
- providing information, instruction and training for employees and others;
- providing monitoring and health surveillance in appropriate cases;
- planning for emergencies.

6. What Substances are Hazardous to Health?

The substances or products (mixtures) that we use or the by-products generated or encountered during any task can cause harm to employees, contractors and other people.

Hazardous substances take many forms and may include:

- chemicals such as bleach;

- mixtures containing chemicals, eg cleaning agents;
- vapours or fumes from welding, etc;
- dusts, eg construction dust emitted from cutting masonry and concrete, etc;
- mists generated when liquids are pressurised;
- nanotechnology;
- gases and asphyxiating gases;
- biological agents including animal or human waste products, bacteria or germs that cause diseases such as leptospirosis (Weil's disease) or legionnaire's disease.

COSHH does not include lead, asbestos or radioactive substances. These are subject to specific regulations.

7. Carrying out an Assessment

Before you start your assessment you need to identify:

- what you do that involves a hazardous substance;
- how it may cause harm to people;
- how you can reduce the risk of that harm actually occurring;
- any Workplace Exposure Limits (WEL) that may be relevant to the substance or mixture being assessed (WELs will be in section eight of a material safety data sheet (MSDS) or in EH40 Workplace exposure limits published by the Health and Safety Executive).

You should always try to prevent exposure at source by:

Not using the hazardous substance or using a safer process that prevents exposure, for example, by using water based inks or paints rather than solvent based products or applying by brush or roller, not spray equipment.

Substitute something safer, eg swap an irritant cleaning product for something milder, or using a vacuum cleaner rather than sweeping up.

Could you use a safer form of the substance? A solid instead of a liquid to avoid splashes.

If you can't prevent exposure you must control it adequately by applying the principles of good control practice. More information is available from Safety Services Unit.

Control is only adequate when the risk of harm is 'as low as is reasonably practicable'.

This means:

- all control measures are in good working order and in respect of local exhaust ventilation this includes a periodic thorough examination and test (at least every 14 months) and you must keep this record for at least five years;
- exposures are below the Workplace Exposure Limit where one exists;
- exposure to substances that cause cancer, asthma or genetic damage is reduced to as low a level as is possible.

8. Task or Other Assessments?

If exposure cannot be prevented then you must carry out and record an assessment. If the exposure is related to a task then the assessment should be based on the task with the aim of ensuring that a single

safe system of work is developed for both substance and task hazards.

Once you have identified all the possible sources of exposure to harmful substances you need to understand the way in which they can harm people.

Information may be readily available on product packaging and MSDSs, etc. Some products may not have a MSDS because they arise as a by-product of a process such as fume from welding or soldering, bio aerosols from composting waste, dusts from construction activities and gases from the decomposition of wood fuel pellets. Further information on these may be available from trade or industry bodies or the HSE.

9. Material Safety Data Sheets

MSDSs carry a whole host of information about substances or mixtures. They are set out in a standard format providing the following information:

- Identification of the substance/mixture and company/undertaking.
- Hazards identification including symbols and hazard statements.
- Composition/information on ingredients.
- First aid measures.
- Firefighting measures.
- Accidental release measures.
- Handling and storage.
- Exposure controls/personal protection including any relevant WELs.
- Physical and chemical properties.

- Stability and reactivity.
- Toxicological information.
- Ecological information.
- Disposal considerations.
- Transport information.
- Regulatory information.
- Other information

The MSDS does not provide all of the information about the substance/mixture to enable a risk assessment to be carried out. It is also necessary to know:

- the quantities that are used in the operation;
- how it is used, eg by spray, pouring, brushing, etc;
- where it is used, in the open air, inside, small/large room, well ventilated or not, and
- the control measures that are already in place/in use.

Note: A MSDS is not a risk assessment!

MSDS are available from the supplier of your substances and they may already be available through the MSDS library on the Sevron web hosted electronic assessment system. They should be supplied at the time of the first delivery and an updated version whenever the manufacturer has reviewed it.

COSHH risk assessments should be compiled on the Sevron system, access and training can be arranged through Safety Services Unit.

During this process, the information that has been gathered about the substance and the task will be assessed and the

appropriate control measures developed into a safe system of work.

The control measures must follow the hierarchy of control measures contained within the regulations as follows:

- Elimination.
- Substitution.
- Automation.
- Mechanisation.
- Enclose.
- Guarding/segregation of people.
- Safe system of work.
- Written procedures.
- Adequate supervision.
- Identification of training needs.
- Information/instruction.
- PPE.

Note: Elimination and Substitution should have already been considered in the early part of the risk assessment process. By the time you are beginning to use the Sevron system, you should be assessing substances/mixtures which are either

- the safer alternative, or
- the safest available that will still be effective.

The use of PPE is the last item on the hierarchy of controls and must only be considered when the prior control measures have been implemented or discounted from use.

Whenever it is necessary to use PPE, the correct standard must be quoted on the risk assessment, for example:

Close fitting, disposable, particulate respirators to protect the wearer from dusts and mists come in three different protection factors numbered P1 (lowest) to P3 (highest). It is important that the correct protection factor is detailed in the assessment or the wearer may not be protected properly.

In addition, to achieve the required level of protection in respect of close fitting respiratory protection equipment, wearers must be clean shaven (within the previous 24 hours) and have undergone and passed a Face Fit Test specific to the model of respirator supplied (air fed respirators would be an alternative for those that are not clean shaven and therefore able to achieve a close fit).

10. Sevron COSHH Risk Assessment System

This system is web hosted and provides a library of MSDSs which can be used to carry out a risk assessment. It will, in most instances, auto-populate the risk assessment with the necessary information direct from the MSDS. The user then has to ensure that these are correct, amending where necessary. The appropriate control measures are then introduced and a safe system of work developed for the whole task taking account of all significant risks associated with it.

The system has a variety of different permissions and includes a restriction on those allowed to 'publish' the assessments.

Service areas need to ensure that they have sufficient individuals with the knowledge and experience of their hazardous substance inventory to enable them to compile risk assessments on the system. Additional users can be arranged by an email request to safety.services@eastriding.gov.uk. This will involve some one-to-one tuition before the request is granted.

11. Health Surveillance

If identified by the risk assessment, managers should arrange health surveillance for their employees. It may be necessary to seek the advice from the

Occupational Health Unit and/or Safety Services Unit at an early stage.

Health surveillance should be carried out if an employee is exposed to a substance listed in Schedule 6 of the Control of Substances Hazardous to Health Regulations 2002 (COSHH) or if:

- an employee is exposed to a substance linked to a particular disease or adverse health effect;
- there is a reasonable likelihood, under the conditions of work, of the disease or effect occurring;
- it is possible to detect the effect.

Health surveillance might involve examination by a doctor, occupational health advisor or trained supervisor, depending on the techniques to be used.

12. Measuring Substance Concentration

The concentration of hazardous substances in the air breathed in by workers must be measured/monitored if:

- workplace exposure limits might be exceeded;
- failure or deterioration of the control measures could lead to serious risks to health;
- the control measures may not operate correctly.

Record of any exposure monitoring must be kept for at least five years. Any monitoring relevant to an individual must be kept with their health record and retained for at least 40 years.

13. Duty to Plan for Accidents and Emergencies

If there is a possibility of a work activity causing an accident, incident or emergency which causes exposure to a substance hazardous to health likely to be in excess of the normal exposure the employer must prepare plans and procedures. The procedures should include provision of:

- appropriate first aid facilities;
- relevant fire drills;
- spillage containment and clean-up procedures;
- information on emergency arrangements, including details of:
 - relevant work hazards,
 - hazard identification arrangements,
 - any specific hazards likely to occur when an accident, incident or emergency occurs;
 - suitable warning systems.

The employer must ensure that when an accident, incident or emergency occurs, steps are taken to:

- minimise the harmful effects to people and the environment;
- restore the situation to normal;
- inform affected employees.

This will not be necessary if the amounts of hazardous substances present at the workplace are only likely to cause a slight risk.

14. Duty to Train

Employers must provide employees with suitable and sufficient information, instruction, training and supervision. This should include:

- details of the substances hazardous to health that they are likely to be exposed to, including:

- the names of the substances,
- the risks they present to health,
- any relevant workplace exposure limit,
- access to relevant MSDS;
- the significant findings of the risk assessment;
- the actions and precautions necessary to safeguard against exposure;
- if used, the PPE necessary to protect the wearer, and
- how to clean and disinfect it,
- how to maintain it,
- how to report defects with it,
- how and when to get a replacement and the manner in which it must be stored;
- the results of any monitoring of exposure;
- the collective results of any health surveillance. These should be in a form that does not allow results to be attributed to a specific individual.

Control measures will not be effective unless employees are trained to use them correctly.

APPENDIX I

Substance Assessment Flow Chart

