

Introducing the Corporate COSHH Procedure

A guide to the corporate procedure



COSHH. The Control of Substances Hazardous to Health Regulations 2002

A manager or supervisor may be a COSHH assessor, or they may manage staff with responsibilities for COSHH.

This briefing is to help managers and supervisors understand what COSHH is, how Hampshire manage the risks of hazardous materials, as explained in the Corporate COSHH procedure, and the hierarchy of controls to be used when assessing the use of such materials. These are defined by the Control of Substances Hazardous to Health Regulations 2002.

You can find the procedure [here](#) or via the schools H&S webpages. If you've not seen this yet, you should read through it now.

A separate attendance course is required for COSHH assessors to ensure they are competent to carry out their role. If in doubt, please speak to your manager for further information, or contact corporateH&Straining@hants.gov.uk

Complying with the law

Following the corporate procedure will ensure that managers are complying with the Control of Substances Hazardous to Health Regulations 2002. These Regulations require employers to control exposure to hazardous substances and keep their employees, customers, clients and visitors safe from harm or injury.

If exposure cannot be removed, then it must be controlled and reduced to the lowest possible level, that is reasonably practical for all parties.



This procedure does not cover exposure to asbestos or legionella, which are dealt with in their own corporate procedures.

Responsibilities

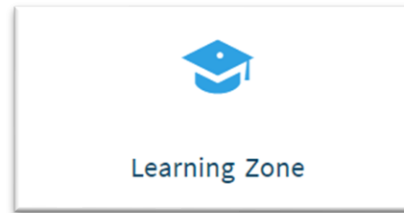
All employees and persons acting on behalf of Hampshire County Council must ensure that whenever they procure, handle, store or use any substance which is hazardous to health; or when they are likely to be engaged in work which might expose them to a substance hazardous to health as a by-product or waste product; they comply with this procedure.

Manager's Responsibilities

As a manager you have responsibility to identify if any of your staff are exposed to substances hazardous to their health arising from their work activities. There is also a wider responsibility to anyone other than your staff, such as contractors, service users, members of the public etc to ensure that their health and safety is not affected by your work activities, this includes the use of COSHH substances.

The manager must also appoint a COSHH Assessor (where applicable) and ensure they complete the Corporate COSHH Assessor training. This will give them the knowledge and skills to enable them to carry out the COSHH assessments, where required.

The COSHH Assessor



A person should be competent to complete a COSHH assessment. This means they should have the skills, knowledge, aptitude/ability, training and experience within their role to be able to identify hazards within your workplace and recommend suitable controls to reduce the risk to users.

Those responsible for carrying out COSHH assessments should firstly complete the relevant training course, then, identify whether any substances used in work activities or created from work activities is a substance hazardous to health as defined by the COSHH regulations or may become hazardous to health when later handled or used.

COSHH Assessor training is provided free by the Corporate Health and Safety Team, search "COSHH Assessor" (LMS_VLS HCC_CS_CSWFD_RSAS_00010VLS) on the Learning Zone.

Managing COSHH

Identify exposure to hazardous substances

As a manager you have a responsibility to identify if employees, service users, contractors, volunteers, members of the public or any other persons are exposed to substances hazardous to health arising from their work activities.

For the purposes of this briefing these groups of people will all be referred to as 'users'.



Where in Hampshire County Council might COSHH apply?



- **Cleaning tasks** - most workplaces contain some cleaning products.
- **Property maintenance** - wood dust, adhesives, solvents, paints, and oils.



- **Ground's maintenance and gardening** - pesticides and fertilisers. Swimming pool chemicals



- **Working with people** - medicines, bodily fluids, biological agents and cleaning products.



- **Transport** - oils, fumes, and fuels.
Catering - flour dust.
- **Office work and printing** - toner, inks, and paper dust.
- **In the classroom** - DT and Science are the obvious sources.



Hazardous substances come in many forms; they may be:

Chemical substances, like cleaning solutions, bleaches, pesticides, paints, oils and lubricants.

Biological agents, such as fungi, mould, and bacteria (from people or animals).

Created during work activities, like brick dust (which contains silica) from drilling into walls, or solvents from spray paints.

Natural products can be hazardous – like flour!



Why are they hazardous?

Hazardous substances can cause many short and long-term health problems.

They can also cause fires, explosions and fatalities if not properly controlled.

Some effects are acute, these happen quickly after exposure to the substance, other effects are chronic which may take years to develop.

Effects may include:

- Eye irritation
- Skin irritation and potentially Dermatitis
- Poisoning
- Breathing problems, including asthma and other respiratory diseases
- Some forms of cancer

The severity of conditions experienced will depend on the substance, the frequency and length of exposure and the levels of protection used.

How do I know if a substance is hazardous?

There are various ways to assess if a substance is hazardous.



1. Does it have a hazard pictogram on the label, packaging, box or instructions for use?

There are 9 different hazard pictograms, they will be a red diamond shape with a black image. If it has a **hazard pictogram** - then it's **hazardous**.

2. Has your supplier given you a Safety Data Sheet (SDS)?

If you have been supplied a **Safety Data Sheet**, which indicates a workplace exposure limit, then your product is **hazardous**. If you don't have an SDS, you can ask your chemical supplier if you should have one. If a product has an SDS then your supplier must provide you with one.

Revision: 2014-10-08 Suma Bac D10 Version: 05.0

SECTION 1: Identification of the substance/mixture and of the company/undertaking

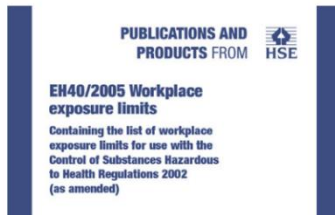
1.1 Product identifier
Trade name: Suma Bac D10

1.2 Relevant identified uses of the substance or mixture and uses advised against
Identified uses:
For professional and industrial use only.
AISEP211: Surface disinfectant. Manual process.
AISEP212: Surface disinfectant. Spray and manual process.
Disinfectant for closed systems or equipment. AISEL, LCPM2 & AISEL, LCPM3.
Uses advised against: Uses other than those identified are not recommended.

1.3 Details of the supplier of the safety data sheet
Chemies Europe Operations B.V., Moissonenbroeksteijn 2, 3542JN Utrecht, The Netherlands

Contact details:
Chemies Ltd
Dunton Road, Gillingham, Northfleet, Kent ME10 2FD, UK (England)
Tel: 01634 420111 Fax: 01634 430000
E-mail: MSD@chemies.com
Website: www.chemies.com

1.4 Emergency telephone number
For local or environmental emergency only:
0800 900 900



3. Are there Workplace Exposure Limits (WELs) in place for your substance?

A **Workplace Exposure Limit (WEL)** is a time limit put in place to reduce the risk to users.

Many thousands of substances are used at work but only about 500 substances have WELs. 'EH40 Workplace exposure limits' is a publication which contains a list of all current GB WELs. If there is a **WEL** in place then yes, your product is **hazardous**.



4. Do you have any 'Industry Specific' guidance to follow within your role?

Check the HSE website or consult your Trade/Professional Association for more information. **Specific guidance** surrounding a product/substance suggests it could be **hazardous**.



5. Still not sure?

If your substance does not have any of these indicators, then it is probably not hazardous, however you can contact the [Corporate Health and Safety Team](#) for advice if you are still unsure!

So, you use hazardous substances, what next?

Ensure the COSHH assessor completes the COSHH assessments with timely reviews

The COSHH assessment template form is available on the Corporate H&S pages, or on the Schools H&S pages. COSHH Assessments should be reviewed every three years, or sooner, should anything change. For example:

- Changes in how you use a substance or complete a task
- An increase in incidents involving hazardous substances
- Using a new product
- How you manage the risk (the control measures) changes.

Make sure the COSHH assessments are printed off and stored on site so that they are accessible to all users.

COSHH template from the Corporate H&S site pages

Corporate COSHH Assessment

This standard risk assessment is to be used to determine the risks and control measures required for hazardous substances and not for biological agents.

Name of Hazardous Substance or Description of Process: _____ Date of Assessment: _____ Date of Review: _____

Location of Activity/Process: _____ Task or process being carried out: _____

Name of Risk Assessor: _____ Risk assessment subject to: _____ Control of Substances Hazardous to Health registration: _____

Manufacturer/Supplier: Name: _____ Tel No: _____ Safety Data Sheet (SDS) attached: Yes No

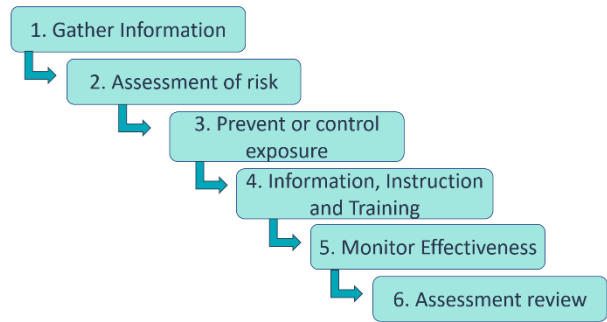
Address: _____ Ref number and date on SDS: _____

Identify the Hazardous Substances that are applicable:

	Harmful (skin irritation, serious eye irritation)		Acute toxicity, very toxic (Fatal) toxic		Respiratory sensitizer, mutagen, carcinogen, reproductive toxicity, systematic target organ toxicity, aspiration hazard		Oxidizing - gases, liquids, solids		Explosive, self-reactive, organic peroxide
	Corrosive (severe skin burns and eye damage), serious eye damage		Harmful to the environment		Flammable gas, liquid, solid or aerosol, organic peroxide, self-reactive, pyrophoric, self-heating, contact with water emits flammable gas		Highly flammable		Under pressure

Please identify and hazard the substance

The COSHH assessment process



COSHH Assessor training will explain the COSHH assessment process, how to recognise hazardous substances, the types of controls, the hierarchy of controls and when to review the assessment.

Ensure the controls identified as a result of the COSHH Assessment are implemented

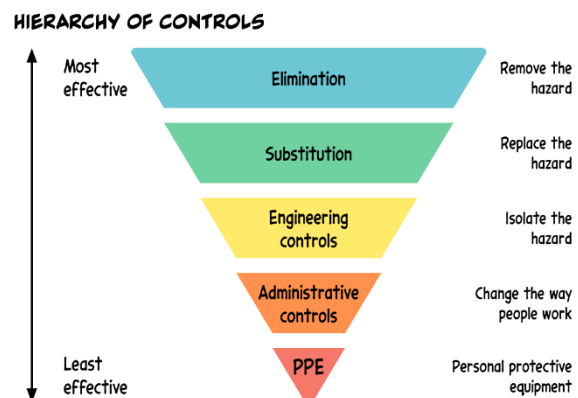
Controls are the measures put in place to reduce or eliminate the risk of exposure.

Wherever possible the hazard should be removed at source (known as elimination) as this protects everyone. Where this is not possible look to substitute the substance for something less dangerous.

The hierarchy of controls is the suggested route for managing hazards, however you may need a mix of controls to manage the hazard effectively.

Your COSHH assessor may not be in a position to authorise additional control measures. Work with them to evaluate these and support your COSHH assessor in their role. As the manager you are responsible for ensuring implementation of control measures, including, where necessary, evaluating options for further controls.

In the event of an incident, you may need to justify your reasons if the suggested controls have not been implemented.



Types of control methods explained:

Elimination

Remove the hazard; change the process to remove the substance, redesign the task to remove the hazard. This is the best option as it removes the hazard completely, so protects everyone.

Substitution

Substitute it for a safer product, or use a safer form of the product, some powders come in tablet form or pastes, reducing the chance of inhalation.

Engineering controls

Isolate people from the hazard, complete the task in one segregated area with ventilation, such as a fume cupboard. Use dust suppression systems, or automatic dosing for machines.

Administrative controls

This involves changing the way people work, implementing safe systems of work, task rotas to limit exposure, cleaning regimes, posters and signage.

PPE

Protect the workers with Personal Protective Equipment (PPE) this could include goggles, masks, gloves. The required PPE for substances will be stated in the Safety Data Sheet.

When choosing controls consider the route of entry into the body, as this will affect the type of controls and their efficiency. The SDS will tell you what PPE is appropriate. You must make sure the controls implemented work together.

For example, there is no point having a system that can't be followed whilst wearing the required PPE!

PPE is a LAST RESORT

You should only use/provide PPE where the risks to health and safety cannot be adequately controlled in other ways.



If PPE is a control measure you should follow the Corporate PPE Procedure [Personal Protective Equipment \(PPE\) and Respiratory Protective Equipment \(RPE\) \(sharepoint.com\)](#)

- PPE must fit correctly.
- PPE users must understand how to use the PPE.
- PPE users must understand what the hazards are and
- How to care for their PPE and what to do if damaged or ineffective.

Communication

Ensure the controls identified in the COSHH assessment are communicated to users



You must share the results of the COSHH assessments with those affected by the hazards, ensure they understand the hazards and what they need to do to keep themselves safe. This will include safe systems of work and what to do in event of accidental spillage or exposure.

Information about the hazards, risks and control measures must be communicated to all those affected in an understandable and relevant way.

Think about the people completing these tasks, what level of understanding and literacy do they have? Would demonstration be a better way?

As always - keep a record of training and information provided. You never know when you might need to prove it's been carried out!

Monitor the effectiveness of the controls

Completing the assessment and implementing controls is not the end of the process. As a manager you must check the controls are working, by monitoring their effectiveness.

You can monitor this in different ways....

- Watch the people using the product or completing the tasks - are they following procedure?

- Do they use PPE correctly? And does it fit?
- Consider your accident and ill-health data. Do you still have the issues you had before the controls were implemented?
- Do the hazards require formal health surveillance? Talk to Occupational Health for assistance.
- Monitor chemical use - are chemicals being used at the correct dilution rates, or is it too little/too much?
- Ask the users - can they think of another way to reduce the risk.

Summary

This is a managers guide to the [Corporate procedure](#). Please refer to this for the full information and links to further webpages to assist you.

You can find the corporate webinar COSHH Assessor training on The Learning Zone.

For further assistance please contact one of the [Health and Safety Advisors](#).