

CAERPHILLY COUNTY
BOROUGH COUNCIL

DRAFT CONTROL OF SUBSTANCES
HAZARDOUS TO HEALTH
(COSHH) POLICY

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Contents

SECTION		PAGE NUMBER
SECTION 1	<u>INTRODUCTION</u>	3
SECTION 2	<u>POLICY STATEMENT</u>	3
SECTION 3	<u>SCOPE</u>	3
SECTION 4	<u>DEFINITIONS</u>	3-4
SECTION 5	<u>LEGISLATION</u>	4
SECTION 6	<u>RESPONSIBILITIES</u>	4-8
SECTION 7	<u>ARRANGEMENTS</u>	8-11
SECTION 8	<u>SUPPORTING DOCUMENTS</u>	12
APPENDIX 1	<u>Example of Substance Inventory List</u>	14
APPENDIX 2	<u>COSHH Assessment ReQuest form</u>	16
APPENDIX 3	<u>COSHH Assessment Request Process Flow Diagram</u>	18
APPENDIX 4	<u>COSHH Assessment Form</u>	20-22

NOTE

Wherever the designation Manager is used throughout this policy, it is taken to mean Head of Service, Head Teacher, Line Manager, Supervisor, and Officer in Charge or anyone who has a responsibility for employees through their work.

For the purpose of integration of this policy into education establishments where the term SYPOL is used CLEAPP school science service can be used as an equivalent.

1. INTRODUCTION

- 1.1 This policy outlines the protective and preventative measures to be implemented by the Authority to ensure the Control of Substances Hazardous to Health (COSHH) found in work activities and workplaces.

2. POLICY STATEMENT

- 2.1 The Authority recognises that its employees are its most valuable resource in delivering high quality services to the community and will take all practical steps to ensure the health and safety of Authority employees, contractors and visitors to and users of Authority premises, where substances hazardous to health are used and stored.

3. SCOPE

- 3.1 This policy has been agreed with the Trade Unions and applies to all employees.
- 3.2 This policy will be reviewed at least annually to ensure it is in line with current legislation.
- 3.3 The effective date of the policy is: XXXXXX

4. DEFINITIONS

- 4.1 Substances Hazardous to Health:
- A. Includes any material, mixture or compound used at work or arising from work activities, which is hazardous in the form in which it occurs in the work activity, e.g. paint, adhesive.
 - B. These substances are classified and/or labelled as very toxic, toxic, harmful, corrosive, oxidising or irritant. For commercially available substances and preparations this information will be provided on the label.
 - C. A substance for which the Health and Safety Commission has approved a Work Exposure Limit (WEL). These are detailed within the current *HSE publication "EH40"*. The WEL is the agreed value of the maximum amount of a hazardous substance an employee can be exposed to over a specified period of time.
 - D. A biological agent.

- E. Dust/fume of any kind, when present at a substantial concentration in air.
- F. Any substance creating a similar hazard but which has not been mentioned above, gases such as argon/helium and medicines, e.g. pesticides, make-up.
- G. Substances that have a chronic or delayed effects, for example, substances that are carcinogenic, mutagenic, or toxic for reproduction.

4.2 The Authority has adopted the Sypol Environmental COSHH Management System to provide competent technical advice relating to hazardous substances.

4.3 Material Safety Data Sheet - MSDS are documents describing the known hazards associated with a material, indicating safe handling procedures and recommending responses to accidents and thus are invaluable sources of safety information.

5. LEGISLATION

5.1 This policy along with its supporting procedures and guidance is designed to ensure the Authority meets its legal obligations as stated in:

- The Health and Safety at Work etc. Act, 1974
- The Control of Substances Hazardous to Health 2002 (as amended)

6. RESPONSIBILITIES

NB Please note that all employees have a legal responsibility to comply with Health and Safety law and the provisions of this policy. Failure to do so could result in personal and / or corporate liability.

6.1 The Chief Executive Officer will:

6.1.1 Be ultimately responsible for ensuring compliance with this policy within Caerphilly County Borough Council.

6.2 Directors will:

6.2.1 Be responsible for ensuring the effective implementation of this corporate policy and associated directorate arrangements within their service areas.

6.2.2 Ensure that appropriate resources are made available for the effective operation of the policy including training.

6.3 Managers will:

- 6.3.1** Ensure that exposure to substances hazardous to health is prevented or where this is not possible, adequately controlled.
- 6.3.2** Ensure that information is obtained relating to all substances used/stored within service area in the form of Material Safety Data Sheets (MSDS) from the supplier or procurement. This shall include any work activity that creates a substance hazardous to health during the process or given off during the activity (dust, fumes etc.)
- 6.3.3** Ensure there is an up to date inventory of all substances used/stored within their service areas. A chemical inventory may be kept on form in [Appendix 1](#).
- 6.3.4** Where appropriate contact your Directorate Health and Safety Officer or ensure a Chemical Assessment Request Questionnaire (CARQ) [Appendix 2](#), form is completed for all substances used/stored within service area and sent to the Directorate Health and Safety Officer for a SYPOL assessment to be undertaken, [Appendix 3](#).
- 6.3.5** Ensure the controls, as identified in the SYPOL assessment are implemented.
- 6.3.6** Ensure where identified in the Sypol/COSHH assessment information, instruction and training is provided to all employees, within a suitable timescale, on the risks they are exposed to.
- 6.3.7** Ensure the SYPOL assessment is reviewed when there is reason to suspect the assessment is no longer valid or there has been significant changes in the work to which the assessment relates.
- 6.3.8** Ensure Personal Protective Equipment (PPE) as recommended in the SYPOL assessment is provided to employees and appropriate information, instruction and training for it's use is provided.
- 6.3.9** Communicate the SYPOL assessment to the relevant employees.
- 6.3.10** Where a SYPOL assessment produces a high risk rating for the substances being used/stored, ensure a COSHH assessment is carried out, [Appendix 4](#).

- 6.3.11** If required, consult their Directorate Health and Safety Officer for advice on deciding if a SYPOL or COSHH assessment is required for a substance being used/stored on site.
- 6.3.12** Ensure the COSHH assessment is suitable and sufficient. Where appropriate arrange for sampling and measurement to be carried out. The detail and expertise with which the assessment is carried out must be relative with the degree of risk arising from the work.
- 6.3.13** Ensure the controls, as identified in the COSHH assessment are implemented.
- 6.3.14** Where identified in the COSHH assessment, a health surveillance programme is to be arranged in conjunction with Occupational Health.
- 6.3.15** Ensure where air monitoring is identified in the Sypol/COSHH assessment, it is undertaken in accordance with *HSE guidance Note EH42, Monitoring strategies for toxic substances*. This monitoring shall be carried out on a periodic basis, depending on the results of the monitoring and where changes are made to potential exposure levels.
- 6.3.16** Ensure air monitoring results are kept a minimum of 40 years.
- 6.3.17** Ensure suitable storage of hazardous substance within their area of control are in line with the MSDS/Sypol assessment/COSHH assessment e.g. segregation of flammable and oxidising agents etc.
- 6.3.18** Ensure suitable welfare facilities are available regarding washing, changing and the storage of Personal Protective Equipment / clothing for employees involved with handling and use of hazardous substances.
- 6.3.19** Ensure that the findings of the COSHH assessment, monitoring results and maintenance findings are communicated to all employees, contractors etc who may be affected by the assessment/ testing etc.
- 6.3.20** Ensure that the findings of the COSHH assessment, are recorded and copies are kept until a new assessment is undertaken or the assessment is revised.
- 6.3.21** Ensure the COSHH assessment is reviewed when there is reason to suspect the assessment is no longer valid or

there has been significant changes in the work, or the substance, to which the assessment relates.

6.3.22 Plan for a response to an emergency involving hazardous substances before it happens.

6.3.23 Ensure their employees comply with this policy and associated Directorate arrangements for the control of hazardous substances derived from this policy.

6.3.24 Ensure this policy is communicated to their employees.

6.4 Each employee of the Authority will:

6.4.1 Co-operate with the competent person in carrying out a COSHH assessment where required.

6.4.2 Comply with any working procedure or precautionary measure introduced to reduce or control identified risks e.g. make full and proper use of any Personal Protective Equipment provided.

6.4.3 Ensure their Manager is notified immediately if they become aware of anything which may constitute a risk e.g. faulty work equipment, work processes/arrangements, incorrect storage of materials.

6.4.4 Employees should, at the cost to the Authority, present his or herself for health surveillance.

6.4.5 Inform their manager of any health problems which could be associated with the substances they are using.

6.5 The Corporate Health and Safety Unit will:

6.5.1 Ensure that the COSHH policy is reviewed at least annually to ensure it is in line with current legislation.

6.5.2 Provide, where requested, advice and information on legislation or guidance relating to safe handling, use and storage of hazardous substances.

6.5.3 Audit compliance with the policy to ensure correct handling, use and storage of hazardous substances.

6.6 Directorate Health and Safety Officers will:

6.6.1 Ensure that any necessary Directorate arrangements are developed in accordance with the Corporate Policy on control of substances hazardous to health.

- 6.6.2 Ensure the communication of the Corporate Policy and Directorate arrangements to all managers.
- 6.6.3 Provide advice, information and support on the control of hazardous substances to Managers as required. This includes supplying Sypol Assessment sheets to users of hazardous substances.
- 6.6.4 Carry out spot checks on the controls implemented and correct handling, use and storage for hazardous substances to ensure they are completed, up to date and are being followed.
- 6.6.5 Monitor the effective implementation of the Corporate Policy and Directorate Arrangements.

6.7 The Occupational Health Unit will:

- 6.7.1 Provide advice on any health issues or health surveillance required arising from the hazardous substances process.
- 6.7.2 Where provided, keep individual monitoring and health surveillance results for a minimum of 40 years.

7. ARRANGEMENTS

7.1 Inventory List:

- 7.1.1 A substance inventory list must be kept on site detailing the chemical name, supplier, form etc. The chemical inventory must be reviewed and kept up to date. (i.e. addition of new items and removal of items that are no longer used). An inventory form can be found in [Appendix 1](#).

7.2 Sypol:

- 7.2.1 A Sypol assessment would be sufficient for most hazardous substances used/store in your service area. To obtain a Sypol assessment complete the CARQ form, [Appendix 2](#), and return it to your Directorate Health and Safety Officer, who will then produce the Sypol assessment and forwarded to yourself.
- 7.2.2 If the hazardous substance is deemed 'high risk' and no alternative can be sourced, then a COSHH assessment must be carried out, [Appendix 4](#). Your Directorate Health

and Safety Officer can provide advice on determining the risk rating of a hazardous substance.

7.3 Identification of hazardous substances:

7.3.1 The COSHH assessment must identify all hazardous substances with the potential to cause harm in the workplace or work activity.

7.4 COSHH Assessments:

7.4.1 The COSHH regulations place a duty on employers (The Authority) to make a suitable and sufficient assessment of the Health and Safety risks to which their employees (and others not in their employment) may be subjected to exposure by hazardous substances. This applies whether a substance is supplied through the council's stores system or bought from a local retail outlet. It should not be used until a written risk assessment has been made and brought to the attention of the user(s).

7.5 Recording the findings:

7.5.1 Record keeping is a legal requirement and is necessary to show that a COSHH assessment has been carried out. The findings of the COSHH/SYPOL assessment must be recorded and kept for a minimum of 40 years.

7.6 Reviewing and revising the assessment:

7.6.1 A Sypol/COSHH assessment is not a one off exercise but should be reviewed and revised periodically.

7.6.2 The Sypol/COSHH assessment should be reviewed if there are any changes in working practices/arrangements /machines/control measures/substances used/substance properties, composition etc which might affect the validity of the assessment.

7.6.3 Sypol/COSHH assessments should also be reviewed following an accident/incident/near-miss.

7.6.4 Sypol/COSHH assessments should also be reviewed where monitoring results or health surveillance shows potential exposure above WEL.

7.7 Communication and Training:

- 7.7.1 Any significant findings from the COSHH assessment together with control measures must be communicated to those who may be affected and records must be kept to show that this information has been communicated e.g. notes of teams meetings, signed and dated check sheets showing that employees have received copies of relevant assessments.
- 7.7.2 Suitable and sufficient instruction and training should be given on the precautions the employees should take to protect themselves and others.
- 7.7.3 The training on the importance of reporting faults.
- 7.7.4 Instruction and training should also be given on how to use personal protective equipment and/or clothing provided and should cover any emergency procedures. E.g. Decontamination.
- 7.7.5 The information provided should be appropriate to the level of risk identified by the assessment and in a manner and form in which employees will understand.

7.8 Monitoring Exposure:

- 7.8.1 Where identified under COSHH assessment, it must be ensured that the concentration of hazardous substances in the air breathed in by employees is measured and that the assessment concludes that:
- There could be serious risk to health if control measures failed or deteriorated.
 - Possibility of the Work Exposure Limit being exceeded or exposure levels being just below the Work Exposure Limit.
 - Control measures might not be working properly.
- 7.8.2 Air monitoring must be carried out when employees are exposed to certain substances and process specified in Schedule 5 of the COSHH Regulations e.g. wood dust.
- 7.8.3 Air monitoring should be carried out on a periodic basis, this will be dependent on monitoring results and if changes occur.

7.8.4 Monitoring records must be kept for a minimum of 40 years.

7.9 Appropriate Health Surveillance:

7.9.1 Health surveillance is required where; it is possible to detect the disease or health effect in the following circumstances:

- Where the employees are exposed to a substance linked to a particular disease or adverse health effect.
- There is a reasonable likelihood, under the conditions of work, of that disease or effect occurring.

7.9.2 Health surveillance may involve examination by a doctor or trained nurse.

7.9.3 The decision to implement health surveillance will be based on the findings of the COSHH assessment and will involve consultation between the Line Manager, the Directorate Health and Safety Officer, Occupational Health nurse, the employees and their Safety Representatives.

7.9.4 The Authority must allow any of its employees access to their own health records once reasonable notice has been given to Occupational Health.

7.9.5 Health surveillance records must be kept for a minimum of 40 years.

7.10 Emergency Plans and Procedures

7.10.1 The manager must plan for a response to an emergency involving hazardous substances before it happens, e.g. Appropriate spillage control.

7.10.2 Emergencies, accidents or incidents involving exposure to hazardous substances, in these instances, relate to those which go well beyond the risk associated with the normal day to day work.

7.10.3 Emergency procedures **are not required** if the hazardous substances only present a slight risk to the employees health and the measures and controls implemented by the COSHH assessment are sufficient to control the risks.

8. **SUPPORTING DOCUMENTS**

8.1 Guidance:

8.1.1 COSHH – A Brief Guide to the Regulations – HSE Guidance ISBN 071762982 INDG 136(rev3).

8.2 This policy should be read in conjunction with Caerphilly County Borough Councils Health and Safety Policies as detailed below:

8.2.1 Corporate Health and Safety Policy.

8.2.2 Risk Assessment Policy.

APPENDIX 1 – Example of Substance Inventory List

Substance Name	Supplier	Hazard	Stored	Form (Liquid/Powder /Gas)	Quantity	Material Safety Data Sheet Available?	Workplace Exposure Limit (if applicable)

APPENDIX 2 – COSHH Assessment ReQuest Form (CARQ)

COSHH Assessment ReQuest Form

Name Company

Material Code
Trade Name
Supplier/Manufacturer

Subscription No:
Renewal Date:

Material Usage Information

How much of the material is used in one working day? (approx)

How long is the worker exposed to the material during the working day?

<1/2 hour 1/2 - 2 hours 2 - 4 hours 4 -8 hours Over 8 hours All day

Where is the material used? (Please indicate below)

Outside Inside Well Ventilated Inside Poorly Ventilated Confined Space

Other (Please specify)



Work Practice Information

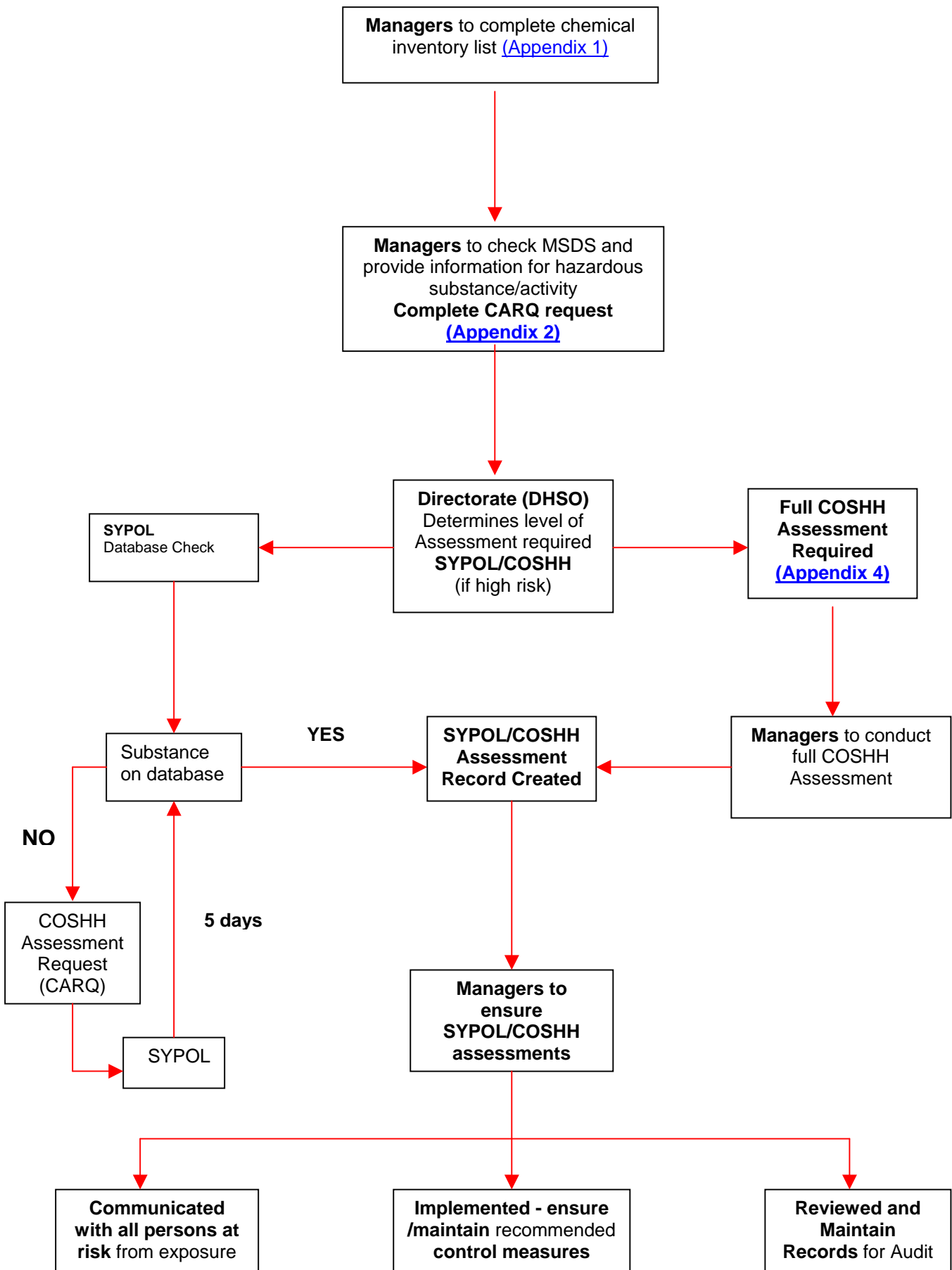
i.e. Diluting, Mixing, Hand Applying, Brushing, Spraying etc...

Existing Control Measures

i.e. Fume Cabinet, Local Extraction Ventilation etc...

APPENDIX 3 – SYPOL/COSHH Assessment Request Flow Diagram

SYPOL/COSHH ASSESSMENT REQUEST FLOW DIAGRAM



APPENDIX 4 – COSHH Assessment Form

COSHH Assessment Form

	COSHH Risk Assessment Substance
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Section 1 Details relating to Substance

Name of Chemical: Other Names:
Hazard(s) identified & CHIP Classification = <ul style="list-style-type: none">• Hazardous substance, please state L/M/H Inhalation: Skin Contact: Eye Contact: Ingestion:
Where can exposure occur - where is the substance going to be used?
Who is going to be exposed to the substance - Who is going to use the substance?
How often is the substance used, for how long and to what extent?

Section 2 – Control Information

Can use of the substance be prevented?
If prevention is not reasonably practicable, what instructions are to be followed to ensure safe use of the substance? Handling: • • Storage: •
What Personal Protective Equipment (PPE) should be worn when using this substance? • Hand: • Eye: • Respiratory: • Skin:
Who will be responsible for ensuring user instructions are a) adhered to, b) maintained, c) examined and tested? a) b) c)
What arrangements will be made to examine and test PPE?
How will this information be recorded?
How are defects or safety concerns raised by staff?
What emergency procedures have been planned? First Aid: Eye Contact: Skin Contact: Fire Fighting: Spillages:

Will exposure to the substance be monitored?

How will employees be informed, instructed and trained about the nature of the substance, the risk associated with using it and what user instruction they should take?

Fire Fighting Procedures

-
-
-

Special Protective Equipment

-

COSHH ASSESSMENT Completed by:

Name:

On date:

Next review due:
