UWESU COSHH Policy
(Control of Substances Hazardous to Health)
Control of Substances Hazardous to Health (COSHH)

Purpose
The purpose of this document is to ensure that all UWESU staff comply fully with the requirements of the COSHH Regulations and other applicable legislations. UWESU is committed to ensuring that use of potentially hazardous substances is minimised, and that when such substances are required to be used, that suitable and sufficient controls are put into place to ensure they can be used safely. This document will set out the procedures and policies that UWESU will implement to achieve suitable and sufficient controls.

Scope
This guidance document applies to all UWESU staff, including managers, supervisors, staff and third parties such as visitors and sub-contractors who interact with UWESU activities. This guidance document applies to all UWESU locations and projects.

What Is A Hazardous Substance?
Hazardous substances are anything which have the potential to cause harm. The level of harm may range from minor irritation to death.
Hazardous substances can include:
- Substances used directly in work activities e.g. beer line cleaner.
- Substances generated during work activities e.g. oven cleaning-cycle fumes.
- Naturally occurring substances e.g. blood, bacteria.

For the vast majority of commercial chemicals, the presence (or not) of a warning label will indicate whether COSHH is relevant. For example, household washing up liquid doesn't have a warning label, but bleach does - so COSHH applies to bleach but not washing up liquid, when used at work.
The term ‘substance hazardous to health’ includes any material, mixture or compound used at work, or arising from work activities, that is harmful to people’s health in the form in which it occurs in the work activity. Categories specifically mentioned are:
- Substances labelled as toxic, very toxic, harmful, corrosive and irritant e.g. cleaning agents and radiographic chemicals.
- Substances assigned a Workplace Exposure Limit (WEL) or a maximum exposure limit - airborne concentrations of chemicals e.g. silicone.
- Harmful micro-organisms, e.g. Hepatitis B, HIV and Tuberculosis.
- Substantial airborne quantities of dust e.g. plaster dust.

Substances Excluded From COSHH Regulations
The following substances are excluded from COSHH but covered by their own Regulations:
- Asbestos.
- Lead.
- Radioactive substances.
- Flammable or explosive substances.
- Substances used in medical treatment. The risk to the patient is excluded but the risk to the doctor or nurse handling the substance is included.
Management Responsibilities
Managers/supervisors have a primary role in complying with these Regulations in the workplace. Their responsibilities will include:

- Ensure that the hazardous substance is accompanied by a Material Safety Data Sheet (MSDS)
- Decide what precautions are needed before starting work with hazardous substances, giving preference to the hierarchy of controls and collective measures over individual protection and Personal Protective Equipment (PPE).
  - Eliminate.
  - Substitute.
  - Reduce Exposure.
  - Isolate Process.
  - Control Exposure.
  - PPE.
- Prevent people being exposed to hazardous substances, but where this is not reasonably practicable, control the exposure.
- Ensure control measures are used and maintained properly and that safety procedures are followed.
- If required, monitor exposure of employees to hazardous substances as identified.
- Establish a system for complying with the Regulations, including clear individual responsibilities and informing employees of these arrangements.
- Undertake COSHH Assessments to account for all work practices in which exposure to hazardous substances may occur.
- Ensure all employees receive appropriate information, instructions and training as required so that they are aware of the risks to health created by their exposure to hazardous substances and the precautions that must be taken.

Employee’s Responsibilities
Employees have a legal responsibility to co-operate with UWESU to ensure its legal obligations are met by attending instruction and training in the use of substances and wearing the appropriate personal protective equipment when required to do so.

- Users of hazardous substances are required to report any symptoms arising from their work with materials to their line manager.
- Users of hazardous substances are required to use all control measures (i.e. ventilation, personal protective equipment) provided in the interests of their Health, safety and Welfare in the manner shown in their training and systems of work.
- Assist the competent persons undertake workplace assessments.

Responsibility for Control Measures
Managers should be prepared to take disciplinary steps against individuals who endanger themselves or others by refusing to use, or not using, equipment or procedures correctly.

Employees have a duty to make full use of the control measures provided and to report immediately any
defects discovered.

COSHH Assessments
The COSHH assessment must be undertaken by a person who is familiar with the systems of work within the area being assessed. It may be necessary to undertake more than one assessment for each area e.g. an assessment for Cleaning activities and another for construction activities. The COSHH Assessment should take the information from the MSDS and make it specific to the working environment and method of use for the product. Every shift must be assessed as the working practices and therefore risks may differ. Assessment includes:

- Identification of all hazardous substances within the area.
- Identify which are hazardous and undertake COSHH assessment on those which are hazardous.
- How much of the substance is used.
- What the routes of exposure are.
- Who is likely to be exposed and whether they are competent or are from a vulnerable group.
- What the substances potential hazards are.
- Existing controls, safe systems of work, security and storage arrangements.
- Emergency situations and non-routine tasks (i.e. spillages or maintenance).
- Workplace Exposure Limits (WEL) for the product.

If there is no risk to health or the risk is trivial, no more action is needed. If there are health risks, then the manager must consider what else needs to be done to comply fully with COSHH requirements.

Control of Exposure
Means of control that are inherently safe are always to be preferred because there are fewer opportunities for protection to fail. For example the following is the order of preference for control measures with the most preferred first:

- Elimination or substitution with a less harmful substance. It might be the material that is substituted or the form in which it is used, e.g. pellet-form rather than powder.
- Combat the Hazard at source i.e. dust extraction at point of cutting wood to remove wood dust instantly on creation.
- Isolation
- Control

Employees are required to make proper use of control measures and to report defects, and managers must take all reasonable steps to ensure that they do so. Managers must also ensure that controls are kept in efficient working order and good repair. Engineering controls and respiratory protective equipment have to be examined and, where appropriate, tested at suitable intervals i.e. Local Exhaust Ventilation or extraction units should undergo a period written scheme of
examination at least every 14 months by a competent person.

**Review of COSHH Assessments**
The COSHH assessment is a working document that must be kept up-to-date. New assessments must be undertaken when a new substance is used in the workplace that is classified as a substance hazardous to health. The original documentation should state when the assessment should be reviewed. Reviews should also be undertaken:

- Annually.
- Change in legislation.
- Where there has been a significant change in the work.
- If the substance used for a different task.
- If the substance used is changed i.e. manufacturer or concentration.
- Upon HS&E team direction.
- Following any adverse event involving the task or substance.

**Maintenance and Testing Of Control Measures**
The precautions required for adequate control must be maintained in an efficient state. Engineering controls must be examined periodically (in accordance with the appropriate statutory inspections) and a suitable record kept of such examinations. For example respiratory protective equipment must similarly be examined, kept clean and, where appropriate, tests carried out to demonstrate their effectiveness.

**Health Surveillance**
Routine surveillance of individual’s health must be undertaken when it is warranted by the degree of exposure and the nature of the effects. Where there is substantial exposure to skin irritants, the regular checking of hands and forearms should be considered for early detection of dermatitis. There may be few instances where the regular analysis of blood or urine is required.

Where employees are exposed to materials with possible long-term effects (such as sensitizers or carcinogens) a note of the fact should be attached to their personnel records. Where health surveillance is needed a health record must be established for each individual containing particulars approved by the Health and Safety Executive (HSE) and held for at least 40 years. Advice on all health surveillance matters should be sought from the appropriate Occupational Health Professional.

**Information, Instruction and Training**
Wherever employees are exposed to hazardous substances they must receive suitable and sufficient information, instruction and training is required so that they are aware of the following:

- The risks to health created by their exposure.
- The precaution which should be taken.
- Control measures, their purpose and how to use them.
- How to use personal protective equipment and clothing provided.
- Results of any exposure monitoring and health surveillance (without giving names).
• Emergency procedures – what to do if they feel ill etc. themselves.

Employees should also be informed of the results of any monitoring carried out in the workplace. The collective results of any health surveillance must also be made known to employees in addition to the specific results of tests pertaining to individuals. Following the completion of COSHH assessments the need for information, instruction and training must be considered and appropriate arrangements made. These might range from a simple instruction to regular formal training sessions. Employees shall also be made aware of the arrangements for COSHH compliance, so that they can play an active part in improving health and safety standards. Where the employees of other disciplines or contractors may be affected, appropriate channels of communications must be established to ensure they are properly informed.

Material safety data sheet
Material Safety Data Sheets (MSDS) provide information on chemical products that will help you to complete the COSHH Assessment. They describe the hazards the chemical presents, and give information on handling, storage and emergency measures in case of an accident including spillage or release.

By law (see REACH, GHS) suppliers of chemicals within the EU must provide an up to date MSDS if a substance is ‘dangerous for supply’. Outside of the EU other countries run similar regulations i.e. Canada or US that will require similar information to be provided.

All MSDS must contain information set out under 16 headings. At first sight some MSDS may appear long and be hard to understand. However, you can obtain the most important information under the following sections:

• Section 2: hazard identification.
• Section 8: exposure controls and protection.
• Section 9: (if a liquid) it’s boiling point or initial boiling point.
• Section 15: the Risk (R) or Hazard (H) statement that describes the hazards.
• For emergencies, sections 4, 5 and 6 may contain useful information.

If information is missing from the MSDS contact the supplier.

The MSDS is not a COSHH Assessment. You should use the information it contains to help make your own assessment. As previously mentioned your COSHH assessment looks at the properties of the substance and the associated hazards and applies them to the working conditions and use of the product undertaken by UWESU.

Completing the COSHH Assessment

Stage One – Identify Hazardous Substances in the Area of Work
Complete the COSHH Register:

• Check what substances are used/present in the area.
• Enter MSDS Ref No.
• Ensure data sheets are obtained for the substances and enter manufacturers/supplier name.
• Read container labels and MSDS and enter the hazardous substance hazard category, if non hazardous then no further action is required.
• Enter the COSHH Assessment Ref No once completed.
• Assess the working area/location to see if this can increase the risk i.e. a confined/enclosed space as opposed to working outside in open air.

Stage Two – Identify Risks to Health from Exposure to the Substance

Complete the assessment form:

• Enter the site location, name of the person carrying out the COSHH Assessment, department, date the assessment was carried out, name of the substance. Use the name that has the most meaning, i.e. Trade, common or scientific name. If the substance has an exposure limit, not it here also and the assessment review date.

• Enter a brief description of how the hazardous substance is to be used. This could include a step by step breakdown of the task being carried out i.e. is the hazardous substance wood dust from cutting, sanding or sawing.

• Enter the means of exposure. This could be via one or more of the following:
  – Inhalation.
  – Skin contact.
  – Eye contact.
  – Swallowing.
  – Injection.

• Hazard identification. This is the hazard of a particular substance is its capability to cause harm to persons or the environment, when a particular degree of exposure occurs. You may find it useful to consult the Approved Supply List CHIP (Chemical (Hazard, Information and Packaging) Regulations), the MSDS or the label on the bottle/container or seek advice from the HSE team to obtain information.

• Name the composition/ingredients of the substance to be used, its classification (R Phases) and what the Workplace exposure limits (WEL) and Short-term exposure limits are, if available.

• List all those people who may be exposed to the substance at the specific exposure points. Consider that these people may be exposed in different ways. Those at risk could be:
  – Production employees.
  – Maintenance employees.
  – Contractors.
  – Visitors.
  – Supervisors and managers.
• Office employees.

• From the MSDS detail the necessary first aid, fire fighting and spillage response measure that are to be in place for the intended use of the substance.

• How the substance is to transported, handled and stored need to be identified and entered onto the COSHH Assessment form.

• List all the controls used to prevent/control exposure. Consider both engineering and procedural controls.

  – Examples of engineering controls are:
    ▪ Local Exhaust Ventilation (LEV).
    ▪ Glove boxes.
    ▪ Fume cupboards.
    ▪ Extractor fans.
    ▪ Ventilation.
    ▪ Drains.
    ▪ Automated dosing/process systems.
    ▪ Calibrated equipment.

  – Examples of procedural controls are:
    ▪ Permit to work.
    ▪ Standard Operating Procedures (SOPs)/Safe Systems of Work.
    ▪ Instruction, training and supervision.
    ▪ Job rotation.

• Any required Personal Protective Equipment (PPE) for the substances intended use is to be identified and highlighted on the assessment. The level of protection require, type and standard need to be mentioned.

• The disposal considerations/instructions are to be identified and if necessary local legislation will also need to be taken into account.

**Stage Three – Conclusions and Action Plan to Ensure Safety**

Draw conclusions from the assessment:

• From the COSHH Assessment form, record adequacy of controls identified against the checklist.

• The person Department manager is to sign the COSHH Assessment to ensure that the assessment is suitable and sufficient.

• Record any recommended actions as a result of the assessment on the Audit Action Register and ensure that actions are closed out before the hazardous substance is used.
• Ensure that all persons that will be using and/or exposed to the substance read or have briefed to them, understand and sign the COSHH Assessment.

Stage Four – Review Assessment

Review the assessment:
• Annually.
• Where there has been a significant change in the work.
• If the substance used for a different task.
• If the substance used is changed i.e. manufacturer or concentration.
• Upon HS&E Team direction.
• Following any adverse event involving the task or substance.