



CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

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Comments	Three forms contained/hyperlinked as part of this document Preliminary COSHH Assessment Form.docx COSHH Assessment Form.docx COSHH Inventory Checklist.docx
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1. Introduction

- 1.1. The use or exposure to chemicals or other hazardous substances or products at work can put people's health at risk. It is Blackwood's policy to ensure that the risks associated with the use of or exposure to chemicals, hazardous substances and/or products is always minimised. This will be achieved by implementing a series of risk control measures. For simplicity, the term hazardous substances will be used throughout this document; however, it should be read as meaning hazardous chemicals and/or products as well.
- 1.2. Our starting point will be to eliminate the use of and exposure to hazardous substances wherever possible. If this can't be done, then we will take all reasonable steps to find less hazardous substances. If we need to use any hazardous substances, suitable control systems will be introduced, and Personal Protective Equipment (PPE) will only be issued where the hazards cannot be effectively managed by other means. The use of all new hazardous substances will be assessed prior to first use.

2. What is COSHH?

- 2.1. COSHH stands for the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the Control of Substances Hazardous to Health (Amendment) Regulations 2004. The Regulations require us to assess and minimise the risks from using or being exposed to hazardous substances at work and to introduce reasonable control measures to manage any residual risks.
- 2.2. COSHH requires us to provide our employees with suitable and sufficient information, instruction and training in the safe use of hazardous substances and to monitor the effectiveness of any control measures in place. In certain circumstances, there may also be a requirement to conduct health surveillance. This will occur if any employee is exposed to hazardous substances which are known or are likely to cause a disease or be detrimental to health or detailed in schedule 6 of the COSHH Regulations. COSHH also requires us to store hazardous substances safely in order to avoid the risks of fire, explosion or environmental damage.

3. What is a Hazardous Substance?

- 3.1. A hazardous substance is defined as any substance that is;

- Dangerous for supply because it is very toxic, toxic, harmful, corrosive or irritant;
- Any substance which has a Workplace Exposure Limit (WEL) see EH40/2005 document for workplace exposure limits;
- Any biological agents used at work;
- Exposure to blood borne viruses, e.g. hepatitis, HIV
- Any dust other than one with a WEL at a concentration in air above 10 mg/m³ averaged over 8 hours, or any such respirable dust above 4 mg/m³ averaged over 8 hours;
- Any other substance that creates a risk to health because of its properties and the way it is used or is present in the workplace.

4. COSHH Procedure

The following procedure is to be followed by all those with responsibilities for the procurement and safe use of hazardous substances.

4.1. Procurement

- 4.1.1. Adequate information on each hazardous substance must be obtained prior to its use. This will take the form of a safety data sheet (SDS), which should be provided by the supplier of the hazardous substance. If a new hazardous substance is to be used for the first time, then if at all possible the relevant SDS should be obtained before it is ordered. Where necessary, further information can be obtained from a number of sources, such as the hazardous substance supplier, or the HSE website - <http://www.hse.gov.uk/coshh>
- 4.1.2. Only approved suppliers are to be used for the procurement of hazardous substances for use in Blackwood workplaces. This does not apply to any hazardous substances used in a care at home setting.

4.2. Use of or Exposure to Hazardous Substances

- 4.2.1. The use of or exposure to hazardous substances must be assessed. For those which have very low-hazard properties, this process will be straightforward. In these cases, it will be assumed that implementation of controls in line with the manufacturer's instructions/product label will be sufficient, and no formal assessment is required i.e. the use of 'Tippex' or 'Whiteboard Cleaner'. Some household cleaners used in a care at home setting may also fall into this category (but not bleach or other similar products).
- 4.2.2. Where there is any doubt as to the level of hazard the following form can be used in order to determine if a hazardous substance is low-

hazard or high-hazard - [Preliminary COSHH Assessment Form.docx](#). Completion of this form may be all that is required for many low-hazard substances/chemicals/products.

- 4.2.3. In the event that we have identified the use of high-hazard substances, such as potential cancer-causing agents, or respiratory sensitisers, we should try and source a less hazardous alternative. Where this is not possible good controls will be required and a full COSHH Assessment carried out. The following form must be used to record the assessment [COSHH Assessment Form.docx](#). The form will help gather/record information about the hazardous substance and allow an assessment to be made on the adequacy of the control measures currently in place and identify if more needs to be done. This process follows five simple steps:
1. Identify hazardous substances in the workplace.
 2. Identify risks associated with those substances.
 3. Decide what can be done to minimise the risks.
 4. Record the findings/actions.
 5. Keep the findings of risk assessments on file.
- 4.2.4. Any formal assessment should be carried out in conjunction with those who actually use the hazardous substance.
- 4.2.5. Where the assessment has identified the need for Personal Protective Equipment (PPE), this must be recorded in detail on the COSHH Assessment. The actual type of PPE must be clearly recorded, and generic statement should be avoided, i.e. wear suitable rubber gloves, instead, specify the type and the EN standard required such as: DERMAGRIP ULTRA LT Nitrile Examination Gloves to EN 374-3.
- 4.2.6. It is worth noting, that if any hazardous substances need to be mixed with other hazardous substances, each must be assessed in order to ensure that no adverse reaction will occur. The SDS will provide information on incompatible hazardous substances. The importance of this procedure must not be overlooked as even everyday cleaning agents can cause a serious reaction if mixed together (i.e. bleach and toilet cleaner may produce chlorine gas).
- 4.2.7. It is important that the findings of the assessment are communicated to all personnel who may be affected by the use of the chemical either directly or indirectly.

4.3. Storage of Hazardous Substances

4.3.1. Suitable storage for hazardous substances must be provided in accordance with the properties of each hazardous substance. The type of storage necessary will be determined by reference to the SDS. Special consideration will be given to flammable liquids, environmentally hazardous chemicals and any oxidising agents (due to the risks of fire/explosion). The following COSHH Inventory List can be used to keep a record of any hazardous substances in use - [COSHH Inventory Checklist.docx](#)

4.4. Managers Duties

4.4.1. The person responsible for managing/supervising and monitoring the use or storage of hazardous substances and ensuring that this procedure is implemented will be the manager with overall H&S responsibilities for the workplace or the activity being carried out. The manager can delegate this task to another person, but the manager retains the responsibility for ensuring the correct procedure is completed to an adequate level.

4.5. Employee Duties

4.5.1. All employees will be expected to co-operate with their managers in respect of any controls which have been introduced, to ensure the safe use and storage of hazardous substances at each workplace. Where PPE has been deemed to be necessary, employees will be expected to wear and maintain it in line with the manufacturer's recommendations. We also expect all employees to report any faults or damage to PPE and relay any concerns to their manager. Should any further action be required, then the employee raising the concern will be informed as to what form it will take.

4.6. Manager/Employee Training

4.6.1. All employees who regularly use or are exposed to hazardous substances will receive information, instruction and training on how to use/store them safely. The level of training will be commensurate with level of risk, hazardous substances being used, and the activity being carried out.

4.6.2. Information, instruction and training can range from a simple instruction to regular formal training sessions. Training will be provided at induction, on the introduction of new hazardous substances or process and at regular refresher training every 3 years. Training can take the form of on the job, formal or e-learning, as a general rule COSHH training should cover the following topics;

- the risks to health created by exposure;
- the precautions that should be taken;
- control measures - their purpose and how to use them;
- how to use personal protective equipment and clothing provided;
- the results of any exposure monitoring and health surveillance.

4.6.3. Employees should also be made aware of the arrangements for COSHH compliance within their team/service/unit so that they can play an active part in improving health and safety standards,

5. Monitoring and Review

5.1. This policy/procedure will be monitored by the Health & Safety Advisor when carrying out periodic safety audits.

5.2. The task/work activity that involves the use of the hazardous substance should be subject to regular monitoring by the relevant manager to ensure that the nature of the task/work activity remains unchanged and that any COSHH Assessment remains valid. The COSHH Assessment should be immediately reviewed if, for any reason it is believed the assessment is no longer valid, i.e. due to a change in legislation or a change of product or the way it is used or the SDS is updated, otherwise the COSHH Assessment will be reviewed annually. All SDS's should be reviewed annually to ensure that it is the correct version for the product currently being used. The COSHH Inventory Checklist can be used to record this check.

5.3. Where contractors are engaged on our workplaces, they will be monitored by the relevant manager to ensure that they do not pose a hazard to employees, visitors or themselves.

6. Record Keeping

6.1. It is a legal requirement for the findings of a COSHH Assessment to be recorded. COSHH Assessments must be kept for a minimum of 5 years and any health surveillance records for 40 years.

6.2. Records may be maintained in paper or electronic format provided they can be easily retrieved.