



Safety & Wellbeing Policy Arrangement

Section 13 – Control of Substances Hazardous to Health

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Arrangement Section 13 – Control of Substances Hazardous to Health

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Arrangement Section 13 – Control of Substances Hazardous to Health

1. Introduction

The Control of Substances Hazardous to Health Regulations, known as COSHH, places a number of duties on the employer, in the main it requires the employer to ensure employees and others who may be affected are not exposed to substances that may be hazardous to health. In general terms the employer has to assess the risk from hazardous substances and ensure that the employee's exposure is either prevented or where this is not reasonably practicable adequately controlled by using a number of techniques.

2. Statement

The Council will undertake to meet the duties placed on it by the Control of Substances Hazardous to Health Regulations and any subsequent amendments to these Regulations, by undertaking a scheme of assessment and implementing control measures to eliminate or reduce the risks from hazardous substances.

Assistant Chief Executives will ensure that there is, in place, a system for undertaking COSHH assessments in all areas of operation for which they have responsibility. The arrangements made to permit compliance with the regulations will:

- apply the eight principles of good practice for the control of substances hazardous to health;
- ensure that the WEL is not exceeded; and
- ensure that exposure to substances that can cause occupational asthma; cancer; or damage to genes that can be passed from one generation to another; is reduced as low as is reasonably practicable.

3. Definitions

3.1 Substances Hazardous to Health - COSHH relates to five categories of substances known to be hazardous to health, these are:

- a) Substances classified as **very toxic, toxic, harmful, corrosive or irritant** in Part I of the Approved List, which lists substances that are dangerous for supply within the meaning of the Chemicals (Hazard Information and Packaging for Supply) Regulations (CHIP Regulations);
- b) Substances with a **WEL** (Workplace Exposure Limit). These substances workplace exposure limits are listed in HSE Guidance Note EH 40, Occupational Exposure Limits (revised annually);
- c) Micro-organisms, which create a hazard to the health of any person. (In practice, any Hazardous Biological Agent in Hazard Groups 2, 3 or 4);
- d) Dust of any kind, when present at a substantial concentration in air;
- e) Any other substance, which creates a comparable hazard to health to any of the above.

There are some substances that are exempt from the requirements of COSHH, these include:

- a) Asbestos as it is covered by its own regulations;
- b) Lead, as it is covered by its own regulations;
- c) Materials that are hazardous solely by virtue of radioactive, explosive, or flammable properties or solely because it is at a high pressure;
- d) Where the risk to health is a risk to the health of a person, to whom a substance is administered during their medical treatment.

3.2 Competent Person:

As with all forms of risk assessment, COSHH assessment work must be undertaken by someone with the appropriate training and experience. The level of training undertaken will determine the limitations someone may have in terms of the level of assessment that can be undertaken. Advice on the requisite level of training must be sought from the relevant Service health and safety team.

3.3 Control Measures:

These include the elimination of the substance, substitution, total enclosure of the process, Local Exhaust Ventilation (LEV), Personal Protective Equipment (PPE) reduction in the number of employees exposed, housekeeping, safe storage, disposal and sanitary facilities. PPE should only be considered as a last resort when it is not reasonably practicable to control the exposure by any other means. However, it should remain readily available in the event of an emergency.

4. Occupational Exposure Limits

These limits are used to provide employers with an exposure level to which an employee's exposures should be kept below. Historically there were two types of Occupational Exposure Limit (OEL), namely a Maximum Exposure Limit (MEL), and an Occupational Exposure Standard (OES), however, recent amendments to the Control of Substances Hazardous to Health Regulations has abolished MEL's and OES's and replaced them with a single standard known as a **Workplace Exposure Limit** or **WEL**.

WEL's may be expressed as either short or long-term limits. Short-term limits relate to the exposure over a 15min period and long-term limits relate to exposure over an 8-hour period. WEL's may be expressed in parts per million (ppm) or mg/m³

5. Atmospheric Monitoring

In order to establish if the WEL is being exceeded it may be necessary to carry out air monitoring of the atmosphere. Any requirement for air monitoring deemed necessary for the evaluation of exposure to health should be referred to the Service Health and Safety team.

In some cases it may also be considered prudent to introduce regular health surveillance for persons involved so that any unforeseen effects are detected at the earliest stage. All persons exposed to certain hazardous substances as defined in Schedule 6 of the COSHH Regulations should receive medical surveillance.

6. COSHH Assessment

To evaluate the level of risk for those identified as being exposed to substances hazardous to health, a suitable and sufficient assessment of the risk will be carried out. The assessment will be conducted by a competent person(s). The basic principle of conducting an assessment should include an inventory of all substances hazardous to health will be maintained, with appropriate hazard information.

A COSHH database/log will be maintained at an appropriate level within each Service, this may be at a property level or at a Service wide level. Additional hazard information may be obtained directly from the manufacturer. All work activities which involve, or may involve, exposure to substances hazardous to health will be assessed and appropriate control measures will be taken where elimination or substitution of the hazardous substance is not possible.

Controls will be properly maintained and monitored to ensure their continued effectiveness. This will be achieved by planned preventative maintenance and annual performance monitoring. All employees and others, who may be present in the affected areas, will be informed of the purpose and safe operation of all engineering controls.

PPE (Personal Protective Equipment) will be used as a last resort or as a back up measure during testing of modifications of other controls or in the event of an emergency. The type and use of PPE will be carefully assessed and maintained according to manufacturers' instructions. Health surveillance of employees, where indicated to be necessary by the assessment, will be carried out by the Council's appointed occupational health provider.

The occupational health provider will keep health records for all employees exposed to substances hazardous to health for a minimum of 40 years. All employees will be provided with comprehensive information and appropriate training on the nature of the hazardous substance with which they are working and will be informed about any monitoring and health surveillance results.

Hierarchy of Controls

The COSHH Regulations require employers to choose the highest reasonably practical level of protection possible from within a recognised hierarchy (table 1). The view is that the controls further down the list are the less effective and it will therefore be necessary to do more to reduce the exposure.

Control	Comment
Elimination	Stop using the substance or process
Substitution	Use a less hazardous alternative substance
Engineering	Provide local exhaust or dilution ventilation
Administrative	Limit duration of exposure
Personal Protective Equipment	Provide gloves, RPE or other protective equipment

Table 1 – Hierarchy of Control

7. Changed Activities or Processes

If a new process/substance is being considered for introduction then the COSHH assessment must be carried out before any changes are implemented to ensure no 'significant risks' are inadvertently introduced. Assessments which have been completed should be reviewed at least annually or where the original assessment may be considered as no longer valid.

8. Maintenance and Testing of Control Measures

All existing control measures (i.e. LEV and Personal Protection Equipment (PPE) and those introduced to meet the recommendations of the COSHH Assessment must be examined at suitable intervals to ensure that the control measures in place are functioning effectively. In the case of LEV such inspections must not exceed every 14 months and indeed may be more often depending on the type and nature of use.

Suitable records shall be kept of all examinations and tests carried out on control measures and any repairs carried out as a result of those examinations and tests. Records for all examinations and tests carried out on LEVs or a suitable summary must be available for at least 5 years from date upon which they were made. Each Service will establish a mechanism to ensure such records are suitably maintained.

9. Management Response to Assessment

The results of the assessment should be discussed with the Manager responsible for that area of work and a suitable action plan developed. Recommendations where implemented will be reviewed at suitable periods to ensure objectives of the assessment have been achieved.

10. Records

All reports, forms, monitoring results, health surveillance (where carried out) associated with the COSHH Assessment must be retained as written proof of satisfying the legal requirement placed upon the Council. These records must be kept readily accessible within the Service at, or close to, the point of substance use, except for health surveillance which will be held by the occupational health provider.

[note: health surveillance records or a copy thereof must be kept in a suitable form for at least 40 years from the date of the last entry].

11. Provision of Information and Training

Where assessments are carried out, all persons involved must have sight of the reports and records, and be provided with adequate information and training. This is to ensure that all activities and processes can be carried out safely and without risk to the health of that person, or anyone else that may be affected.

Safety Data Sheets for all hazardous substances used must be brought to the attention of all persons involved, and it may be considered prudent to record the issue of such information.

**North Lanarkshire Council
COSHH Assessment Form**



Service:		COSHH assessment reference number	COSHH /
Section:			

Information about the substance

Product name		MSDS attached?	Yes / No
Description of substance			
Supplier details			
What is the substance used for? (cleaning surfaces, treating floors etc.)			

Properties of the substance (✓)

Irritant	Harmful	Toxic/ Very toxic	Oxidiser	Explosive	Dangerous to environment	Corrosive	Flammable/ Highly flammable	Biological hazard

The substance is hazardous to health when (✓)

<input type="checkbox"/> In contact with skin	<input type="checkbox"/> Inhaled	<input type="checkbox"/> Injected
<input type="checkbox"/> In contact with eyes	<input type="checkbox"/> Ingested	<input type="checkbox"/> Other (<i>specify</i>)
Hazards to health (include risk and safety phrases)		
Workplace exposure limits?	Long term exposure (8 hr TWA)	Short term exposure (15 minutes)

How is the substance being used?	
How is the substance used? (e.g. diluted in water, applied with a brush, sprayed etc.)	
Approximately how much of the substance is used? (approximate amount on each use, frequency of use, duration of use)	
Is the substance likely to change state during use? (e.g. solid to liquid, liquid to gas)	
Does the substance react during use to produce new substances? (provide details of any new substances, indicate if they are hazardous, identify any relevant COSHH assessments)	







Who is exposed to the substance? (✓)		
<input type="checkbox"/> User	<input type="checkbox"/> Members of the public	<input type="checkbox"/> Other (specify)
<input type="checkbox"/> Other workers	<input type="checkbox"/> Visitors	
Does the substance present additional risks to certain groups or individuals? (✓)		
<input type="checkbox"/> Young people	<input type="checkbox"/> Other (specify)	Identify the nature of any additional risks
<input type="checkbox"/> New or expectant mothers		

Control measures	
Can the existing process be eliminated, or the substance in use replaced with a less hazardous alternative? (✓)	
<input type="checkbox"/> Yes (provide details)	
<input type="checkbox"/> No (provide explanation)	

What controls are required for this substance, other than Personal Protective Equipment (PPE) (✓)				
Ventilation control		General	Inspection Scheme in place	Yes / No
Work environment monitoring		Monitoring for what substance and frequency of sampling?		
Individual monitoring		Monitoring for what substance and frequency of sampling?		
Health surveillance		Surveillance for what substance(s) and frequency?		
Storage arrangements		Outline arrangements needed		
Chemical reactions		Are there any other substances this substance must not come into contact with?		
Spillage arrangements		Outline arrangements needed		

Health & Safety Form – COSHH Assessment Form
 Review Date: 05/05/2019 Reference HSF6

What controls are required for this substance, other than Personal Protective Equipment (PPE) (✓)			
Disposal arrangements		Outline arrangements needed	
Transport arrangements		Outline arrangements needed	
Information, instruction and training		Outline arrangements needed	
Fire arrangements		What additional fire risks are presented?	
		Fire risk assessment to be updated?	

Is any PPE required when using the substance? (✓) (enter type and standard)						
						
Visor	Respirator	Eye protection	Dust Mask	Overalls	Gloves	Other

First aid measures	
Ingestion:	
Inhalation:	
Eye contact:	
Skin contact:	
Other:	

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Assessment of risk

Are all the controls detailed above currently in place?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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If these controls are not in place, or additional controls are required, state remedial actions to be taken:

Remedial actions required	Date for completion

Taking into account the effective implementation of the identified risk control measures, estimate the risk to health from use of this substance. Health and Safety Guidance Note GN HSW 5 Guidance on risk rating	Severity (1 – 5)	Likelihood (1 – 5)	Risk rating (S x L)	
Risk (✓)	Tolerable (1-4)	Medium (5-10)	High (11-16)	Immediate Action (17+)

Assessor(s) name:	Assessor(s) signature:	Date:

The line manager should sign below to show that the assessment is a correct and reasonable reflection of the hazards and of the control measures and actions required.

Line managers name:	Line managers signature:	Date:

Remedial actions complete (date):	Line managers signature:

Risk assessment review

Review date:	Reviewed by:	Action taken/required:
Review date:	Reviewed by:	Action taken/required:
Review date:	Reviewed by:	Action taken/required:
Review date:	Reviewed by:	Action taken/required:
Review date:	Reviewed by:	Action taken/required:

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Employee Information Sheet

Hazardous Substances

We are all surrounded by substances that can cause us harm in some way. Whilst some correctly think of strong acids or toxic gases there are other substances that, if not used properly, can also cause harm and injury e.g. water, salt or flour.

Within the workplace the Control of Substances Hazardous to Health Regulations (COSHH) places a duty on an employer to risk assess the substances used there in order to make the workplace as safe as reasonably practicable.

Hazardous substances

So what are hazardous substances? A summary definition would suggest that a hazardous substance would include:

1. substances used directly in work activities (e.g. adhesives, paints, cleaning agents);
2. substances generated during work activities (e.g. fumes from soldering and welding);
3. naturally occurring substances (e.g. grain dust);
4. biological agents such as bacteria and other micro-organisms.

If not managed properly then there is scope for our health to be affected. Each substance will have a range of effects depending on whether it is a solid, powder, gas or liquid and potentially our gender and age will also contribute to the overall effect. Some of the more common effects of hazardous substances include:

1. skin irritation or dermatitis as a result of skin contact;
2. asthma as a result of developing allergy to substances used at work;
3. losing consciousness as a result of being overcome by toxic fumes;
4. cancer, which may appear long after the exposure to the chemical that caused it;
5. infection from bacteria and other micro-organisms (biological agents).

COSHH Assessments

Because of the variable nature of the risks associated with the use of substances the Council endeavours to risk assess substances in order to reduce the risk of harm to employees to a level that is as low as reasonably practicable and in any event below the published "work place exposure limit".

A specific COSHH Assessment form exists within the Council (often referred to as HSF6) and this form is used to methodically consider the risks and controls needed to correctly manage the risks from substance use.









Your line manager/supervisor will arrange for you to receive the necessary information, instruction and training to use the substances associated with your work activity. You can obtain more information on the assessment process from your line manager or by visiting the COSHH page on CONNECT.

Does COSHH always apply?

There are a number of substances that are not covered by the COSHH regulations, mainly because other regulations apply to them. These other regulations still required the Council to manage the risks associated with the substance but it would potentially require a different assessment and set of control measures. Substances to which COSHH does not apply include:

1. asbestos and lead, which have their own regulations;
2. substances which are hazardous only because they are:
 - radioactive;
 - at high pressure;
 - at extreme temperatures; or
 - have explosive or flammable properties.
3. biological agents that are outside the employer's control, e.g. catching an infection from a colleague. (If in doubt, please contact Health and Safety Division for advice.)

The presence of a warning label is a good indication as to whether COSHH is relevant. That said it will not be restricted to those substances with labels so some thought is required when determining the COSHH assessment programme. Warning label symbols are changing with GHS symbols being introduced around the world (See table below).

	GHS Symbol	UK Symbol	Safety Precautions
<p><u>Toxic /Very Toxic</u> May cause serious health risk or even death if inhaled, ingested or if it penetrates the skin</p>			<ol style="list-style-type: none"> 1. Wear suitable protective clothing, gloves and eye/face protection 2. After contact with skin, wash immediately with plenty of water. 3. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice 4. In case of accident or if you feel unwell, seek medical advice immediately
<p><u>Corrosive</u> May on contact cause destruction of living tissues or burns</p>			<ol style="list-style-type: none"> 1. Wear suitable gloves and eye/face protection 2. Take off immediately all contaminated clothing 3. In case of contact with skin wash immediately with plenty of water 4. In case of contact with eyes, rinse immediately (for a minimum of 15 minutes) with plenty of water and seek medical advice
<p><u>Harmful</u> May cause limited health risk if inhaled or ingested or if it penetrates the skin</p>			<ol style="list-style-type: none"> 1. Do not breathe vapour/spray/dust 2. Avoid contact with skin 3. Wash thoroughly before you eat, drink or smoke 4. In case of contact with eyes rinse immediately with plenty of water and seek medical advice
<p><u>Irritant</u> May cause inflammation and irritation on immediate or repeated contact with the skin or if inhaled.</p>			<ol style="list-style-type: none"> 1. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice 2. In case of contact with skin wash immediately with plenty of water 3. Do not breath vapour/spray /dust

If you have any questions about the use of substances in your workplace speak to your supervisors or line manager. Advice is also available from the Health and Safety team.

Schedule 1

Impact Assessments

Document Title: Health and Safety Policy
Arrangement Section 13 - Control of Substances Hazardous to Health.

Date: 1 April 2017

Review Date: As circumstances dictate.

Environmental Impact Assessment: This document has been assessed for significant environmental impact; no detrimental impact has been identified.

Equality Impact Assessment: This document has been assessed for significant equality implications; no significant issues have been identified.

General Comments: This document is the arrangement section, relating to the management of hazardous substances in the workplace, associated with the Council's health and safety policy required by the Health and Safety at Work Act 1974, the general aims of the council is to ensure a healthy and safe working environment for all persons working for or make use of Council Services. Nothing in the document serves to have any negative impact on the above issues and indeed, in general, associated documents will encourage positive consideration of the factors to ensure all members of the workforce and community are afforded access to the same safe and healthy workplace.