

Control of Substances Hazardous to Health Policy (COSHH)



Version 3

1.0 Purpose:

This corporate topic-based health and safety policy details the specific responsibilities for the management and control of substances that are hazardous to health within Warwickshire County Council (WCC). This Policy therefore does not duplicate the general health and safety requirements as stated within the corporate WCC health and safety policy. To access this policy please refer to the health and safety intranet or school document library (refer to section 9 for details).

2.0 Objective:

The objective is to ensure that all health, safety and wellbeing issues relating to the use of Hazardous Substances are adequately managed and controlled.

3.0 Warwickshire County Council Commitments:

- WCC complies with the Control of Substances Hazardous to Health (COSHH) Regulations and all other relevant statutory requirements and, where necessary, best practice guidance;
- WCC avoids the use of hazardous substances as far as is reasonable practicable. Where not possible:
- WCC assesses the risk(s) to health arising from work activities involving hazardous substances and implements adequate control measures to ensure that the exposure to hazardous substances is prevented or controlled/ reduced.
- WCC undertakes COSHH audits to ensure assessment, arrangements and controls i.e. training, health surveillance are monitored and adequately reviewed.

4.0 Scope

The Policy is applicable to all areas and activities of Warwickshire County Council.

Please note: Some substances are excluded from the COSHH Regulations but are covered by their own specific regulations. These include: radioactive materials, asbestos, lead and lead products, material hazardous due to flammability only (these fall under Dangerous Substances and Explosive Atmosphere Regulations (DSEAR), and substances used for medical treatment. Within WCC *asbestos, legionella, and DSEAR risk management is considered within other WCC policies. The radon monitoring and management procedure is developed by Physical Assets, Property Risk Management, who are responsible for its implementation as appropriate.*

5.0 Definitions

The key terms used within this Policy are outlined below:

5.1 Hazardous substance

- A substance with the potential to cause harm if inhaled, ingested, injected or absorbed through the skin or released into the environment. Common substances such as cleaning materials, herbicides and pesticides can be hazardous and/or harmful to the environment. Hazardous substances occur in the following forms from a packaged item, work process or waste:
 - Substances or a mixture of substances classified as dangerous which carry warnings such as Toxic, Very Toxic, Harmful, Corrosive, Irritant, Sensitising or Carcinogenic
 - Substances with Workplace Exposure Limits (WEL)
 - Biological agents (bacteria, viruses and other micro-organisms)
 - Any kind of dust in a specific concentration
 - Any other substances which may potentially create a risk to health, e.g. dusts, liquids, vapours, gases, mist, fibres, solids or smoke.
- These substances usually indicate their basic hazard group by having a warning symbol on the label.

5.2 Material Safety Data Sheet (MSDS)

- Health and safety information written in a standardised format and provided by the supplier or manufacturer of a substance. The MSDS will tell you if the substance is classified as a hazardous substance. It also provides information on handling, storage and emergency measures to be taken.

5.3 COSHH Risk Assessment

- Is a careful examination of hazardous substances within the workplace and an evaluation of their potential to cause harm; taking into account the control measures/precautions that have been taken for their use.
- Please note that this level of assessment is only required for those substances that are classified as hazardous to health (and therefore do not need to be undertaken for all non-hazardous substances). Use the MSDS to ascertain whether it is hazardous.
- Within WCC the COSHH Assessment is undertaken in two parts. Part 1 by the manager or nominated competent person, and Part 2 by the County COSHH Officer.

5.4 Workplace Exposure Limit (WEL)

- WELs are British occupational exposure limits and are set in order to help protect the health of workers. WELs are concentrations of hazardous substances in the air, averaged over a specified period of time, referred to as a time-weighted average (TWA). Two time periods are used:
 - long-term (8 hours); and
 - short-term (15 minutes)

5.5 COSHH Risk Assessment Register

- This is the COSHH folder/ hardcopy of COSHH assessments. This register contains

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a current index of substances, current risk assessments and MSDS applicable for an activity/workplace. This should be kept close to where substances are being used and be easily accessible to all relevant employees. These records must be kept for a minimum of five years

5.6 Health surveillance

- Health surveillance may be required by law if your employees are exposed to noise or vibration, solvents, fumes, dusts, biological agents and other substances hazardous to health, or work in compressed air. Health surveillance is undertaken by occupational health and is used for early identification of ill health and helps identify any corrective action needed.

6.0 Roles and responsibilities for COSHH

The arrangement section of this Policy provides more detail on how these roles and responsibilities can be implemented.

6.1 Managers (Head teachers, line managers, supervisors etc.) must ensure that:

- all hazardous substance(s) are identified for their work activities (this includes all substances that are used, processed, or generated as part of that process). The Material Safety Data Sheet (MSDS) should be used as part of this identification process. Personal items brought into the workplace which may have a hazard symbol, e.g. flammable do not require you to obtain a MSDS e.g. personal hairspray and deodorants.
- use of those identified hazardous substance(s) is avoided where possible.
- a COSHH risk assessment is completed if avoidance is not possible (refer to Section 7.1).
- a COSHH risk assessment register (refer to Section 5.5) is produced and kept up to date. The COSHH assessment register including COSHH risk assessments must be kept for a period of 5 years.
- all substances are stored and labelled correctly in accordance with manufacturer instructions. Appropriate hazard symbols should be provided on all storage areas/cupboards where a risk has been identified.
- substances (e.g. hazardous waste, clinical waste, recycling of containers, etc) are correctly disposed of using approved/licensed waste carriers. The paperwork relating to the disposal of hazardous substances, such as consignment notes, is held on file for three years as per the Hazardous Waste Regulations.
- any localised exhaust ventilation (i.e. LEV) or engineering controls are regularly inspected, examined, tested and maintained in compliance with statutory requirements and manufacturer's instructions.
- health surveillance (as identified through the COSHH risk assessment process) is undertaken as and when required via Occupational Health. These records must be kept for 40 years (managers must ensure that these records are held on the employees' personal file).
- suitable arrangements are in place to deal with accidents and emergencies involving hazardous substances (e.g. spills, emergency first aid response, etc.) (refer to 7.2).
- the COSHH implications for any change in process/ new products are considered before implementation of that proposed change.

6.2 Employees must:

- familiarise themselves with the relevant COSHH risk assessments, activity risk assessments, procedures and safe systems of work and implement them accordingly.
- use hazardous substances in accordance with the manufacturer's instructions and COSHH risk assessments.
- report any health symptoms arising from their work immediately e.g. skin irritation, breathing problems.

6.3 Occupational Health Service will:

- undertake health surveillance as required following receipt of a manager referral.
- keep all health surveillance records for a minimum of 40 years from date of last entry and provide managers with a report of the findings for action and retention on personal file.
- liaise with the Corporate Health, Safety & Wellbeing Manager (and HSW service) and HR & OD Services as required.

6.4 The County COSHH Officer will:

- review and sign off the COSHH Assessment for hazardous substances used for County Council activities where provided by managers. This includes identification of necessary control measures such as Health Surveillance, Workplace Exposure Limits (WEL), Localised Exhaust Ventilation (LEV) and, Personal Protective Equipment (PPE).

7.0 Organisational Arrangements

7.1 COSHH Risk Assessment

- The WCC template form has been produced to ensure all relevant information is considered as part of the assessment with relevant sign off. Refer to the COSHH Risk Assessment and Guide to Completion.

7.1.2 Control measures

- An important part of the process of COSHH risk assessment is the identification of effective control measures. All control measures must perform as intended and continue to prevent or adequately control the exposure to substances hazardous to health. If controls are found to be inadequate and therefore could result in reduced efficiency, effectiveness or levels of protection for staff, they need to be improved. When identifying control measures the hierarchy of control as stated below must be followed:
 - Avoid/Elimination - Eliminate the use of a harmful substance.
 - Substitution - Use a safer form of the product, e.g. paste rather than powder.
 - Reduction - reduce the amount used or the time spent using the substance
 - Isolation/ enclosure
 - Local Exhaust Ventilation (LEV) / General ventilation i.e. doors/ windows
 - Safe systems of work
 - Information, instruction, training
 - Supervision
 - Personal protective equipment (PPE)

- Control measures must take into account the action required in the event of an emergency, e.g. spill procedure or fire evacuation. (see 7.2 below also)

7.2 Emergencies

- In the event of an emergency involving a hazardous substance, the manager must take immediate steps to:
 - Make the area safe
 - Minimise the effect of the event
 - Inform any staff who may be affected
 - Restrict access to the affected area to essential personnel only and provide with the necessary PPE until the situation returns to normal
- Details of emergency procedures, including a spills procedure, must be documented, communicated to staff, displayed in the workplace. In addition it should be tested, reviewed and revised periodically. Emergency situations and near misses should be reported immediately using the WCC Accident/Incident reporting database.

7.4 Disposal / Environmental Procedure

- Substances no longer used must be disposed of in accordance with the manufacturer's instructions (information can be found on the MSDS) Care should be taken to ensure that containers disposed through normal general waste route are completely empty prior to disposal
- Waste must be collected by a registered waste carrier and transferred to a site that is licensed to take the type of waste being disposed. Details can be checked on the Environment Agency Website – www.environment-agency.gov.uk, alternatively contact the Environmental Management Systems Officer in the Resources Group who will verify this information.
- Waste disposal paperwork must be held on file for three years for hazardous substances (two years for non-hazardous substances) and be easily accessible Further information regarding dealing with waste is available on the intranet > Helping You Work > Environmental Guidance > Working Instructions.
- Clinical waste is classed as a substance hazardous to health and includes all human tissue including blood, whether infected or not, and all related swabs, items used to dispose urine, faeces and other bodily excretions, i.e. bed pan liners, stoma bags, incontinence pads. Where clinical waste is routinely generated (for example, special schools), it must be disposed of using the yellow bag system using an approved carrier and records kept for three years.
- Where clinical waste is produced occasionally, it must be carefully double-bagged and disposed of as domestic waste.

8.0 Equality and Accessibility Information

- If this information is difficult to understand, the Health, Safety and Wellbeing Service can provide it in another format, for example Braille, in large print, on audiotape or another language.
- A full Equality Impact Assessment has been undertaken for this Policy.

9.0 Contact Information

All health, safety and wellbeing information is available on the intranet. Go to [Intranet](#) > [HR](#) > [Health, Safety and Wellbeing](#).

For Schools, refer to the health and safety document library on www.warwickshire.gov.uk/SchoolHSdocs

Alternatively you can contact the County COSHH Officer at cossh@warwickshire.gov.uk or contact the Health, Safety and Wellbeing Service on healthandsafety@warwickshire.gov.uk or telephone 01926 476803.