



# Control of Substances Hazardous to Health (COSHH) Standard

Incorporating Dangerous Substances and  
Explosive Atmospheres Regulations (DSEAR)

Warwickshire County Council



This standard has been produced in accordance with Warwickshire County Council's (WCC) Health and Safety Policy and outlines the minimum requirements that must be met.

## Who is this Standard for?

The requirements of this document apply to any type of work activity with hazardous or dangerous substances undertaken within WCC and will assist managers and Head teachers in fulfilling their responsibilities and legal obligations in relation to the COSHH and DSEAR regulations.

It is applicable to anyone where hazardous, flammable and other dangerous substances are part of their work activities or to anyone who manages them, to ensure that as far as is reasonably practicable, working with chemical products is risk assessed, planned and carried out safely.

The extent of planning and controls required will depend upon the type of work and the risks involved. For example, a school cleaner would require fewer controls and procedures than for a motor vehicle technician. In addition to this standard, some services will need to refer to industry specific guidance and practice, for example, grounds maintenance teams who use herbicides.

Some substances are excluded from the COSHH Regulations because they are subject to their own specific regulations, for example:

- radioactive materials
- lead and lead products
- legionella
- asbestos

## What is COSHH?

Within WCC, COSHH will apply to almost all workplaces, although in some offices, for example, it may only be the cleaning staff who use hazardous substances.

Where substances that are hazardous to health are used in the workplace, the COSHH Regulations require the employer to:

- assess the risk of injury and ill health to employees and others who may be affected
- decide what control measures are needed to prevent injury & ill health
- put the control measures into practice
- ensure that control measures are used and maintained
- monitor exposure to hazardous substances, if required
- carry out appropriate health surveillance, if required
- plan for accidents, incidents and emergencies
- ensure employees are properly informed, trained and supervised



## What is DSEAR?

DSEAR will only apply to a small number of workplaces in WCC who store and use large quantities of fuel, for example. The general use of small quantities of flammable, corrosive or dusty substances can be adequately controlled within the COSHH requirements.

Where substances used or are present that could cause harm as a result of a fire or explosion or corrosion of metal, the DSEAR regulations require the employer to:

- find out what dangerous substances are in their workplace and what the risks are
- put measures in place to either remove or if not possible, control them
- put controls in place to reduce the effects of any incidents involving dangerous substances
- prepare plans and procedures to deal with accidents, incidents and emergencies
- ensure employees are properly informed and trained to control or deal with the risks
- identify and classify areas of the workplace where explosive atmospheres may occur and avoid ignition sources (from unprotected equipment, for example) in those areas



## Plan – consider activities, risks, competency/ refer to WCC/service/industry standards

### How do I know what chemical products I have?

- carry out a thorough audit of your workplace
- make a list of the chemical products that you find. Include the exact product name, manufacturer and quantity
- check all areas where chemical products might be found, including outside storage sheds and garages

### How do I know what they are for?

- consider how the chemical products are being used at your workplace
- consider the activities that chemical products are being used for
- consider any hazardous products that are being produced during a work process, such as dust, waste, fumes (e.g. dust while using a band saw)
- consider if any products you find are no longer required, then See disposal section

### How do I know if the chemical products are hazardous?

- for each chemical product you need to obtain the Safety Data Sheet (SDS). These should be available from the manufacturer or the supplier from their websites, by email or telephone. The COSHH officer may also be able to supply a copy on request
- in section 2 of the SDS, if it has one or more hazard phrases (H-number), often with a hazard symbol, then the product is classed as hazardous under COSHH and a risk



assessment is required: ([COSHH risk assessment](#))

- if the SDS shows that the product is not classed as hazardous, just retain the SDS as a record
- for any produced hazardous products that do not have a SDS, such as sawdust or flour dust, there may be specific guidance available online, for example in the woodwork and catering industries
- further advice can be obtained from the Health, Safety and Wellbeing COSHH Officer

## Where do I keep SDS and COSHH risk assessments?

- COSHH risk assessments and SDS should be kept together in a COSHH folder
- the COSHH folder should have an up to date index page
- the law requires that the SDS and risk assessments be accessible to employees whenever work is being done, and it is good practice to keep them close to where the products are being stored or used
- in small workplaces a single, centrally held COSHH folder should be sufficient
- in large workplaces multiple copies may be required, for example a secondary school could have one in every cleaner's cupboard
- in some workplaces it can be appropriate to keep the COSHH folder electronically, as long as the information is accessible as required above, taking into consideration potential network and power problems

## What about potential accidents or incidents?

You will need to have an emergency plan and procedure in place for foreseeable accidents and incidents involving hazardous chemicals at work so that an immediate and correct response can be made. This should include:

- the right equipment to deal with the emergency, e.g. spillage kit, the right protective equipment and clean-up procedure
- the right first aid response
- the right arrangements to deal with any waste
- the right training for employees so they know the correct response, including when to contact emergency services

The safety data sheets contain first aid and emergency information relevant to the chemical/activity.

## What should I consider when buying new products?

The manager is responsible for ensuring all chemical products used by employees to carry out their work are suitable, approved and of the lowest risk, where possible. A purchasing policy or system will help management to fulfil their responsibilities, especially where the purchasing is delegated to other staff.

- only allow the purchase of management approved/authorised chemical products that will have been through a COSHH risk assessment



## PLAN • DO • CHECK • ACT

- prevent staff purchasing, using or bringing in their own chemical products that may bypass the COSHH risk assessment process e.g. cleaning staff who are unhappy with the performance of an authorised product using an alternative from a local store
- having a purchasing policy can provide an official procedure for trialling and testing new products

The personal property of employees, for example cosmetics, perfumes, and toiletries for personal use are the responsibility of the individual owner. Employees are expected to keep such items safely and appropriately in their personal storage space, like lockers, bags or desks.

### **What about chemical products belonging to / used by other teams or third parties?**

- COSHH compliance is the responsibility of the manager of employees who take part in activities that use or create hazardous chemicals in the workplace. The risk assessment should address any potential risk to other building users
- other WCC teams or departments who share your workplace are responsible for their own COSHH arrangements
- where chemicals are stored in a shared storage space, the SDS for each chemical product should be shared between all users of the storage space
- where chemicals are used in a shared workspace, risk assessments and SDS should consider all users and be available to all users of the workspace
- third parties, for example contract cleaners or caterers, are responsible for their own COSHH compliance and systems, although those commissioning them must ensure that they check the third party is complying with COSHH regulation requirements

An integral part of the planning is also to consider when, how and who will monitor, review and re-audit the products that you hold and use to check that nothing significant has changed and that the arrangements and controls in place are still effective and working.

This should include reviewing the SDS, risk assessments and any other documentation to ensure that it is still current and relevant.



**Do** - implement safe working practice/control measures  
produce documentation/records/arrange training/  
inform staff

### **How do I complete a COSHH risk assessment?**

Once you have produced your list of chemical products and identified which are hazardous substances, you will then need to complete the COSHH risk assessment process.

You will need to complete a risk assessment for each activity that uses or produces



hazardous substances using the WCC COSHH risk assessment form.

For detailed guidance on completing this, refer to the [COSHH Risk Assessment Guidance document](#)

- if a work activity uses a single chemical product, the risk assessment will cover that one product for that activity
- if a work activity uses more than one chemical product, but each product has a similar hazard classification and is used in the same way, then they can be included in a single COSHH risk assessment. For example; cleaning floors with several products all classed as “irritant”, would be considered under one risk assessment for “cleaning floors”
- if a work activity uses more than one chemical product, but each has a different hazard classification, then the use of each product within the overall task will need individual assessments

### Safe working practices and control measures

- a COSHH risk assessment may identify the need for additional, or alterations to, existing safe working practices and/or control measures. These need to be implemented effectively, e.g. purchasing better gloves or improving ventilation
- the HS&W Service / COSHH Officer will advise and support the service manager in high risk environments where the need to carry out worker exposure monitoring, and /or health surveillance has been identified.

### How should I store chemical products?

- chemicals must be kept in appropriately secure storage to minimise the risk of unauthorised or accidental access to them
- level of security depends on the hazards, quantities and the people within the workplace, e.g. childproof cupboard with locks and high-level bolts for a nursery school; locked doors on store rooms and cleaner’s cupboards for a secondary school
- chemicals must be housed safely within their storage areas. In a “general” storeroom you may need to keep them in their own locked cabinet or cupboard
- incompatible chemicals, for example; acidic and alkaline products, need separating from each other in the storeroom
- chemical containers must be labelled with their contents, including hazard symbols when hazardous
- products should be kept in their original containers and not decanted into other containers, like plastic milk bottles
- consider the type and height of shelving, working space, ventilation, quantities stored etc.
- further advice on storage can be obtained from the Health, Safety and Wellbeing COSHH Officer



## How do I dispose of unwanted chemicals?

Chemical products no longer used must be disposed of in accordance with the manufacturer's instructions (see SDS for information). Chemical products classified as hazardous under COSHH are hazardous waste and must be disposed of appropriately.

- hazardous waste produced by WCC premises must be collected by a registered waste carrier. Household waste recycling centres cannot accept this hazardous waste because WCC premises are business/ commercial sites, not domestic
- the manager is responsible for choosing a registered waste contractor and arranging with them for collection. Any waste disposal paperwork must be kept for three years at the workplace
- containers can be disposed of as general waste or recycled, but only if they are clean and empty
- clinical waste is a hazardous waste and includes all human tissue including blood, and items used to dispose of urine, faeces and other bodily excretions. Where clinical waste is routinely generated, for example in special and nursery 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 only occasionally or accidentally produced, e.g. first aid waste, it must be carefully double-bagged and disposed of as domestic waste.
- further information is available on <https://www.gov.uk/dispose-hazardous-waste/producers-and-holders> , from WCC Environmental Management Facilities in the Resources Directorate, or the Health, Safety and Wellbeing COSHH Officer can be contacted for advice

## What training do staff need?

Employees need the appropriate training, instruction and information on the safe use of hazardous substances to enable them to do their job safely, relevant to their role and work activities.

As part of their training and induction, employees need to understand the results of the COSHH risk assessment and what this means in practice:

- what the hazards and risks are
- what control measures and PPE are required
- what to do if there is an accident/incident/emergency
- any workplace exposure limits
- the results of any exposure monitoring and the general results of any health surveillance

Some or all of the points above may already be included in existing safe systems of work or method statements etc.



Simply handing the risk assessments to employees and asking them to sign to say they have read them may not achieve the required level of understanding. For example, employees with learning difficulties, or employees for who English is a second language, may benefit from practical demonstrations.

Employees should have access to safety data sheets and risk assessments. A record of training must be kept.

The Health, Safety and Wellbeing COSHH Officer can provide awareness training to management and staff on request.



**Check** — monitor how effective arrangements & measures are/any incidents/issue



**Act** — take action/have a plan of action for any gaps /revisit arrangements/measures/documentation

## Review of COSHH risk assessments

COSHH risk assessments, like other types of risk assessment, need reviewing to check that they are still up to date and reflect the current workplace and activities. This review will require a check to see if the SDS for the chemical used has been updated by the manufacturer / supplier.

COSHH risk assessments should be reviewed:

- at least annually
- if there has been a significant change in the task
- if there has been a change in the chemical products used
- if there has been an accident, incident or case of ill-health relating to a chemical product
- if there has been a change in employee circumstances, for example health conditions or disability

If the review identifies that a risk assessment needs updating, this must be done as soon as possible. This may range from small updates, e.g. adding a new control measure, up to a complete reassessment. These changes must be shared and discussed with all relevant staff.

## COSHH Audits

The role of the Health, Safety and Wellbeing COSHH Officer includes the requirement to visit WCC workplaces and carry out COSHH audits. The aim of these audits is to test



compliance with the COSHH regulations and they will consider both the practical and record keeping/risk assessment aspects of COSHH.

The frequency of COSHH audits by the Health, Safety and Wellbeing COSHH Officer are as follows:

- annually for workplaces that are considered as a higher potential risk (e.g. routine, frequent use of hazardous chemicals, like workshops)
- every three years for workplaces that are considered low risk
- in response to a request from another WCC health and safety professional.

Certain workplaces considered very low risk, like offices, will not be subject to COSHH audits, but COSHH checks will be part of the annual workplace health and safety inspection programme.

Managers are advised to carry out their own COSHH audits annually when risk assessments are due for review, to check:

- they have an accurate inventory of chemical products on site
- they have current safety data sheets for them
- they have risk assessments for those chemical products identified as hazardous under COSHH
- the risk assessments have been reviewed as required
- the storage of chemical products is safe and secure – including labelling of containers

When a chemical product is no longer used in a workplace, the COSHH risk assessment and SDS should be removed from the COSHH folder and held in an archive for five years before disposal. The COSHH folder index should be updated.

## Further Information

For further advice and guidance:

The Health, Safety and Wellbeing COSHH Officer on [coshh@warwickshire.gov.uk](mailto:coshh@warwickshire.gov.uk)  
Health, Safety and Wellbeing service on [healthsafetyandwellbeing@warwickshire.gov.uk](mailto:healthsafetyandwellbeing@warwickshire.gov.uk)  
Environmental Management Systems (hazardous waste) [ems@warwickshire.gov.uk](mailto:ems@warwickshire.gov.uk)  
The HSE COSHH internet pages at [www.hse.gov.uk/coshh/](http://www.hse.gov.uk/coshh/)