

CORPORATE PROCEDURE

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

1 Aims of the procedure

The aim of this procedure is to ensure consistent assessment of risk, the application of control measures and the working practices for the use of hazardous substances. It shall also ensure compliance with the Control of Substances Hazardous to Health Regulations (COSHH).

2 Responsibilities

2.1 Corporate Directors

Corporate Directors will be responsible for the overall implementation of this Corporate Procedure.

2.2 Heads of Service

Heads of Service will be responsible for the day-to-day implementation of this Corporate Procedure and will ensure the provision of the necessary resources to ensure a safe system of work, comply with the requirements of the policy and the regulations.

2.3 Governing Bodies of Schools Maintained by Education Authority

There is a shared overall responsibility for health, safety and welfare between the LEA, governing body and headteacher.

2.4 Managers/Team Leaders/Headteachers

2.4.1 Managers/ Team Leaders/Headteachers are responsible for ensuring the implementation of this Corporate Procedure within their workplaces to comply with management guidance.

2.4.2 Therefore within each work area, Managers/Team Leaders/Headteachers shall be responsible for: -

- Evaluating injuries, near misses and sick leave related to hazardous substance exposure.

- Staff receiving the appropriate information, instruction, supervision and training.
- The systematic identification and recorded assessment of all potentially hazardous substances. Whilst managers/Team Leaders/Headteachers can designate key staff to undertake relevant assessments it should be noted that they are not able to delegate their own responsibility.
- Monitoring control measures and performing regular audits of the tasks.
- Giving consideration during the selection of new staff to the health and physical suitability of the applicant in relation to potential exposure to hazardous substances. Where appropriate, modification of the job description, environment and work-rate must be agreed.
- Ensuring safe systems of work are followed and procedures enforced.
- Reviewing emergency procedures relevant to their areas of work to ensure the risk of exposure to hazardous substances is not necessarily increased during a work activity.
- Ensuring Corporate Policy and Procedure are communicated to employees.

2.5 Corporate Health & Safety Section

The Corporate Health & Safety Section shall provide advice and guidance on all aspects of chemical safety.

2.6 Employees

Each employee of the Authority shall: -

- Take reasonable care to ensure their safety and that of others and adhere to the Authority's Policy on managing the risk of exposure to hazardous substances.
- Adhere to the COSHH Assessments carried out and control measures required while exposed to hazardous substances.
- Inform their managers of any change in their health status which may be affected by exposure to hazardous substances e.g. illness, injury, pregnancy.
- Use appropriate controls where provided for a task in order to avoid or reduce the risks associated with exposure to hazardous substances. The controls should be used in the manner in which the employee has been instructed and for its intended purpose.

- Co-operate with Managers / Team Leaders/Headteachers to ensure they have attended the necessary training. Adhere to the information given and convey relevant information to other colleagues where necessary.
- The employee has the right to refuse to carry out (according to the Management of Health and Safety at Work Regulations (MHAWR)), a task where the potential risk of injury is likely and unreasonably high; and where the risk could reasonably and practicably be avoided by the provision of training, instruction, information, supervision and appropriate resources.
- Comply with the Authority's accident and hazard reporting procedures in all cases involving injuries, incidents or near misses affecting themselves, other colleagues, service users or non-employees.

3 Application

The COSHH Regulations do NOT apply –

- When the substance in use is Lead – in this case the Control of Lead at Work Regulations take precedence;
- In the case of Asbestos - the Control of Asbestos at Work Regulations will apply;
- Where the risk to health of a person arises from a substance administered as a medical treatment to that person.

Caution – The above risks should still be assessed either under the specific regulations mentioned and/or under the general requirement of the Management Regulations.

4 The Identification & Assessment of Hazardous Substances

4.1 The following is best done if possible as a team effort; it is a relatively simple procedure but may be time consuming. Do not try to achieve too much too fast. Steady progress is a better approach. The Corporate Health and Safety Section is available to help whenever needed.

4.2 Using the Corporate Risk Assessment Form [CF/04/02](#) it is necessary to record all actions in respect of these regulations. A computer record is acceptable but the information held should be fully accessible to every person who needs knowledge of it, and the record should be protected so that it cannot easily be erased, deleted or altered by unauthorised access.

4.3 Survey the workplace and the work to be carried out and list ALL the substances involved. It is important at this stage to list every substance whether

considered hazardous or not. It is necessary to understand that obnoxious and/or toxic fumes/substances may be produced by the work activity.

4.4 The information recorded against each substance should be along the following lines:

- Name or trade name of the substance (or substance identification).
- Purpose of the substance (if any).
- Quantity kept and where (or quantity present).
- Size and colour of container (if any).
- Hazard warning symbol (if any).
- Supplier (if any).
- Manufacturer or Source
- Safety Data or Hazard Warning Sheet held?
- Where not already held, obtain from the supplier or manufacturer a copy of their Material Safety Data Sheet (MSDS). If no manufacturer or supplier can be identified then a generic MSDS should be obtained once the substance is identified.
- Identify the control measures already in place to control exposure of the substance.
- Using the information so far gathered rearrange the list so as the most hazardous substance head the list. In this way it is hoped the most serious risks will be addressed first.
- Obtain further information about the substance from any other available source.
- Communicate with the workforce on the hazards associated with substances identified, controls used and controls needed.
- A COSHH Assessment specific to the work or workplace is required by the regulations. It is therefore important to detail all local conditions and requirements.

5 Prevention or Control of Exposure to Hazardous Substances

5.1 The main aim of any COSHH Assessment is to find a way to PREVENT the exposure of employees or others to the harmful effects of any hazardous substance.

5.2 If it is not possible to prevent exposure then the Manager / Team Leader/Headteacher shall so far as is reasonably practicable, CONTROL any exposure so that no one suffers any harmful health effects.

5.3 Prevention and/or control should be by some means other than the provision of Personal Protective Equipment or clothing (PPE). PPE should only be issued where all other measures have been taken and exposure to the substance is still possible.

5.4 Where there is exposure to a hazardous substance the following measures shall be taken into account by the Manager/Team Leader/Headteacher unless the measures are not practicable: -

- The total enclosure of the process or the system using the substance.
- Plant, processes and systems of work that minimise the generation of or suppress and contain spills, leaks, dust, fumes and vapours from hazardous substances.
- A limitation of the quantities of the substance at the place of work a limitation of the number of persons which might be exposed
- Prohibition of eating, drinking, and smoking in any area which may become contaminated.
- The provision of adequate hygiene measures including washing facilities and the regular cleaning of the premises.
- Where possible the demarcation of areas which may be contaminated and the provision of adequate and suitable signs.
- The safe storage of all hazardous substances and the use of closed and clearly labelled containers.
- Where applicable the disposal of contaminated containers, equipment and PPE shall be in accordance with the Control of Hazardous Waste Regulations.

6 Maintenance of Control Measures

Identified control measures shall be maintained in an efficient state and in good working order. Certain engineering controls e.g. Local Exhaust Ventilation

must be subject to a thorough examination at least once every 14 months or if required more frequently.

7 Monitoring of Exposure to Hazardous Substances

7.1 Where the COSHH Assessment identifies a circumstance where inadequate control measures result in an employee being exposed to hazardous substances in harmful quantities then the employee's exposure needs to be monitored by a specialist.

7.2 Records of monitoring must be retained for 5 years unless the record represents the exposure to a substance by an identifiable employee – then the record must be retained for at least 40 years.

8 Health Surveillance

8.1 The COSHH Regulations list in Schedule 2 some substances and some occupations where the exposure of an employee to a substance listed could cause a recognisable ill health effect in the employee. A copy of Schedule 2 or any other part of the regulations can be obtained from the Corporate Health & Safety Section.

8.2 If the substances listed in Schedule 2 are to be used (or are already in use) at work by NPTCBC employees, or if an employee could be exposed to a similar substance(s) during their work, the Managers/ Team Leaders/ Headteachers should immediately contact the Occupational Health Unit (OHU) on telephone number 01792 512801.

8.3 The OHU will arrange to assess the situation and provide, where appropriate, health surveillance and/or medical surveillance. When providing surveillance the OHU and/or the medical adviser shall have regard for the provisions of COSHH Regulation 11.

8.4 Where Health Surveillance is provided, a health record will be retained in the manner approved by the HSE and shall be maintained for 40 years from the date of the last entry in that record.

8.5 Employees who are subject to health or medical surveillance under these regulations must co-operate with all reasonable requests for information whether of a medical nature or not and must attend appointments made for such surveillance activity. All appointments will be during working hours and at the expense of the employer.

9 Information Instruction and Training

9.1 Any employee who works in any way with hazardous substances will need to be provided with information, instruction and training which is suitable and sufficient for him/her to know: -

- a. What the hazards are if exposed to the substance; and
- b. The precautions needed to prevent exposure.

9.2 Additionally if monitoring of exposure to a substance has taken place the employee concerned will be given information about the results of that monitoring; and, information will be given about collective (a group of employees) health surveillance – however such information must not identify any particular employee.

9.3 Adequate information, instruction and training must be given to any person who has responsibility under the COSHH regulations so that they are able to carry out that responsibility or duty satisfactorily.