

## LIVERPOOL HOPE UNIVERSITY

# CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

## **CODE OF PRACTICE**

Responsibility for Policy:	Legal Services and Health and Safety Assistant
Approved by and date:	University Council 11 <sup>th</sup> March 2014
Frequency of Review:	Five Yearly
Next Review date:	December 2024
Related Policies:	University Health and Safety Policy Asbestos Management Policy
Minor Revisions:	25/08/2015 20/12/2019
EIA:	Not Required

The University recognises that the use a of range of substances, as defined in the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (amended) when used within the workplace may give rise to hazards to health causing injury or ill health. Under these regulations and the general duty of care under the Health and Safety at Work Act 1974 Liverpool Hope University will ensure that the responsibility to protect staff and others against risks that may arise from work activities involving hazardous substances is upheld. The University shall ensure that through its activities, work is not undertaken that is likely to expose staff, students or members of the public to a risk of injury or ill health as a result of hazardous substances and this code of practice aims to be authoritative in providing guidance about working with a range of substances ensuring staff are able to achieve compliance with the aforementioned regulations.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (amended) applies to a very wide range of substances and preparations, usually mixtures of two or more substances with the potential to cause harm if they are inhaled, ingested, come into contact with or are absorbed through the skin. Substances hazardous to health can occur in many forms, including:

- solids,
- liquids,
- vapours,
- gases,
- dusts,
- fibres,
- fumes,
- mist
- and smoke.

The COSHH Regulations apply to any substance which is listed as part of the <u>HSE's What is</u> <u>a Hazardous Substance? Guidance</u> and in the case of chemicals which are labelled as very toxic, toxic, harmful, corrosive or irritant, this will also include:

- Any preparation (mixture) that is dangerous for supply;
- Any substance which has a Workplace Exposure Limit (WEL);
- Any biological agents used in the workplace;
- Any dust other than one with a WEL at a concentration in air above 10 mg/m3averaged over 8 hours, or any such respirable dust above 4 mg/m3 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.

Due to the specific risks posed by working with harmful substances, it is a requirement that a suitable and sufficient assessment of the risks that could be created by the work has been undertaken and that appropriate control measures have been implemented to reduce the risk to staff, students, visitors or members of the public to the lowest acceptable level. Members of staff undertaking a COSHH assessment are advised to follow the following risk assessment process.

## **COSHH Risk Assessment Process Flowchart**



### Responsibilities

• Heads of School/ Subject or Department

Heads of School/ Subject or Department must ensure that COSHH risk assessments are undertaken where appropriate and are suitable and sufficient. All findings must be recorded and control measures should be monitored and reviewed periodically for effectiveness. Heads of School/ Subject or Department must also ensure that a competent person is appointed to undertake the completion and review of COSHH assessments and corresponding records are updated appropriately. Where there is a significant exposure risk related to a work activity or practice within the department, suitable surveillance arrangements must be implemented as part of each department's control measures.

• Vice-Chancellor's Office

The Legal Services team shall monitor and audit compliance with the COSHH Code of Practice. On request the Legal Services and Health and Safety Assistant will provide information and advice to staff regarding specific substances covered as part of the COSHH regulations and provide sufficient resources and training to enable staff to comply with this policy. Further to this the Legal Services and Health and Safety Assistant shall assist the facilitation of monitoring or surveillance arrangements that are designed to measure the ongoing risk posed to employees working in environment's where COSHH controls are particularly relevant.

• Safety Coordinators

Safety Coordinators shall monitor any arrangements in place to reduce or monitor exposure to any COSSH related substances that may be in use within their department and ensure that departmental COSHH risk assessments are reviewed by themselves or other competent persons at regular intervals. Safety Coordinators shall also liaise with any other competent persons within the department when required to ensure that implemented control measures and working practices remain effective to minimise the risk of working with COSHH related substances.

All Staff

All University staff are required to take reasonable care of themselves and others when working with substances covered under the COSHH regulations and shall ensure all control measures, as communicated within the corresponding COSHH risk assessment, are adhered to. This shall also include during teaching activities, where students may be exposed to hazardous substances.

Staff must attend all training provided for them by the University and shall report any immediate concerns or shortcomings with regards to COSHH arrangements to their local Safety Coordinator or the Legal Services and Health and Safety Assistant.

• Estates Department

When dealing with external contractors engaged for works that are likely to expose themselves or others, including University staff, to risks relevant to COSHH, the Director of Estates is responsible for ensure all works are properly planned and any relevant works adhere to the general requirements under the COSHH regulations.

### **COSHH Risk Assessments**

The purpose of a COSHH assessment is to allow each department to make an informed assessment about the measures necessary to prevent or adequately control the risk of exposure to any substances hazardous to health. As this is a specific risk a separate COSHH risk assessment should be completed in addition to the University's existing risk assessment pro forma for general workplace hazards. A COSHH risk assessment template is outlined below (Appendix 1) and this template can be adapted to suit each department; alternatively other appropriate formats can also be used.

The COSHH assessment process shall enable each department to demonstrate that they have:

- 1) considered all the factors pertinent to the work or activity;
- 2) reached an informed and valid judgement about the risks;
- 3) considered the practicability of preventing exposure to hazardous substances;
- 4) considered the steps which need to be taken to achieve and maintain adequate control of exposure where prevention is not a practical solution.

COSHH risk assessments must address **specific** intended work and demonstrate that the risks associated with the work are properly assessed and recorded. Listed below are the sources of information that should be consulted when commencing a COSHH risk assessment (as set out at Stage 1 of the COSHH Assessment Process flowchart);

- Safety Data Sheets (SDS) for all hazardous chemicals and substances must be requested from and provided by the supplier at the time of purchase. For substances that arise as a result of a particular process there will be no specific data sheet.
- Check with the HSE for information regarding Occupational Exposure limits.
- Check with the HSE for specific guidance sheets or any other technical literature.
- Observe working practices in advance, if practicable prior to completing the assessment process.
- Consult with competent staff that are involved with the work process or activity and may have experience of working with similar substances.

- Consult existing emergency plans, adaptations may be required in the case of explosive, toxic or flammable substances.
- Check standard risk assessments in use for the same process or activity to check that all significant hazards have been considered.

## **Good Practice Guidelines**

The COSHH Regulations encourage good practice and emphasise the importance of considering the following 8 principles as part of the COSHH assessment process:

- 1. Design and operate processes and activities to minimise emission, release and spread of substances that are potentially hazardous to health.
- 2. Take into account all different and relevant routes of exposure from inhalation, skin absorption and ingestion when developing control measures.
- 3. Control exposure by measures that are proportionate to the health risk involved.
- 4. Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health.
- 5. Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment.
- 6. Check and review regularly all elements of control measures for their continuing effectiveness.
- Inform and ensure all employees attend appropriate training on the hazards and risks from the substances they work with and the use of control measures developed to help minimise these risks.
- 8. Ensure that the introduction of control measures does not increase the overall risk to health and safety.

## **Hierarchy of Control**

Using the HSE's Guide: Working with Substances Hazardous to Health (INDG136) staff are encouraged to apply the following hierarchy when devising risk controls for activities involving hazardous substances.

- 1. Eliminate the use of a harmful product or substance and use a safer one
- 2. Use a safer form of the product e.g. a paste rather than a powder
- 3. Enclose the process as much as possible to minimise substance release
- 4. Extract any emissions nearest to the source
- 5. Expose as few staff as possible
- 6. Provide reliable, appropriate personal protective equipment (PPE). PPE must fit staff correctly be worn correctly and be replaced regularly to remain effective.





#### SUBSTANCE INFORMATION

One of the key control measures of this risk assessment is the stringent application of the process flow chart, and procedures, attached to this risk assessment. The risk assessment should be read in conjunction with this safety control process flow chart.

Substance/material:				
What is the substance used	for?			
(E.g. cleaning floors, protective	e coating, etc.)			
What are the hazardous ingr	What are the hazardous ingredients/chemicals in the substance? (List below)			
Do any of the chemicals have	e:			
Workplace Exposure Limits.				
Is the substance:				
Extremely flammable?		Very toxic?	Sensitising?	
Highly flammable?	Oxidising?	□ Corrosive?	□ Other? (Specify below.)	
□ Flammable?	□ Harmful?	□ Irritant?		
	□ Toxic?			
Is the substance hazardous	to health when	:		
□ In contact with skin?			ther (Specify below)	
In contact with eyes?	□ Swall	owed?		
USE OF SUBSTANCE				
How should the substance b				
(E.g. diluted in water, applied w	•	ayed, etc.)		
How much is used every wee				
(State quantity in litres or kilos as appropriate.)				
Who is exposed to the substance?				
(E.g. those using it, pupils, service users, etc.)				
Does the substance present		s to certain grou	ps or individuals?	
(E.g. young people, expectant mothers.)				

<b>CONTROL MEASURES</b>	
GONTROL MEASURES	

Can a less hazardous substance be used to do the same job? (If you don't know, please contact your supplier for further information.)

What controls are required for this substance, other than Personal Protective Equipment (PPE)?

No 🗖

Yes 🗖

(E.g. well ventilated areas, not in spray/mist form, mechanical ventilation, authorised persons only.)

Is any Personal Protective Equipment (PPE) required when using the substance?			
F	Eye protection? (State type required)		
	Overalls/clothing? (State type required)		
Other? (State type required)			
<b>How should the substance be stored?</b> (E.g. locked cupboard, away from other substances, etc.)			

Have persons using this substance been provided with information or	Yes 🛛
training on its use? (As a minimum ensure a copy of this assessment is in a known and readily	No 🗆
accessible location.)	

### **OTHER PRECAUTIONS AND EMERGENCY PROCEDURES**

Spillages: How should an accidental release/spillage of this substance be dealt with?

First aid: What actions should be taken if the substance is:		
a) Swallowed?	b) In contact with eyes?	
c) In contact with skin?	d) Inhaled?	
a) $Other?$ (Blacco aposity)		

e) Other? (Please specify.)

**Fire precautions:** What actions should be taken in the event of fires involving this substance?

**Chemical reactions:** Is there any other substance that this substance must not come into contact with?

Disposal: How should the substance be disposed of (or not disposed of)?

Health surveillance: Do staff using the substance require any health surveillance?

## **ASSESSMENT OF RISK**

Are all the controls detailed above currently in place?

Yes 🛛 No 🗆

If these controls are not in place, or additional controls are required, state action to be taken. Please note - COSHH substances must **NOT** be used if adequate control measures are not in place.

Remedial actions required	Date for completion

Are hazards to health adequately controlled with all control measures  $Yes \square No \square$  in place?

Assessor(s) name:	Assessor(s) signature:	Date:
Line Managers name:	Line Managers signature:	Date:
Remedial actions complete: (Date)	Line Managers signature:	Reviewed on: (Date)

## **Further Reading**

A step by step guide to COSHH Assessment http://www.hse.gov.uk/pubns/priced/hsg97.pdf

Control of Substances Hazardous to Health (COSHH) Essentials guidance publications <u>http://www.hse.gov.uk/pubns/guidance/index.htm</u>

Hazards Symbols and Hazard Pictograms

https://www.hse.gov.uk/chemical-classification/labelling-packaging/hazard-symbols-hazardpictograms.htm

Control of substances hazardous to health. The Control of Substances Hazardous to Health Regulations 2002. Approved Code of Practice and Guidance

The Control of Lead at Work Regulations 2002.

The Workplace (Health, Safety and Welfare) Regulations 1992. Approved Code of Practice.

Legionnaires' disease. The control of legionella bacteria in water systems 2013. Approved Code of Practice and Guidance

Guidance on the safe use of pesticides for non-agricultural purposes.

Occupational exposure limits: Containing the list of maximum exposure limits and occupational exposure standards for use with the Control of Substances Hazardous to Health Regulations 1999 Environmental Hygiene Guidance Note EH40 (revised annually)

Chemical Classifications – The CLP Regulations 2015

Dust: General principles of protection Environmental Hygiene Guidance Note EH44

An introduction to local exhaust ventilation HSG37

Seven steps to successful substitution of hazardous substances HSG110

Health surveillance at work HSG61

Monitoring strategies for toxic substances HSG173