

# HEALTH AND SAFETY

## SAFETY POLICY & ARRANGEMENTS



**Date:**           **October 2023**

**Issue:**          **No. 8**

**Subject:**       **Hazardous Substances – (COSHH)**

### Introduction

**This document forms part of the National Ice Centre's organisational written safety policy arrangements.**

Departments, services or teams may consider it appropriate to develop additional guidance and systems of work on specific work related activities.

Where proposals, additional guidance or changes to systems of work will have an impact on health, safety and welfare, this will be discussed and agreed at the Health & Safety Committee.

If you have any questions or require further information or support on the contents of this document, please contact the NIC Health & Safety Advisor or Corporate Safety Advice.

### Overview Of Management & Colleague Responsibilities

#### Manager Responsibilities

Below is an overview of the responsibilities which is intended to support managers in identifying their key duties that need to be taken to comply with the requirements of this document and the safety management systems of the National Ice Centre.

- Managers must identify all potentially hazardous substances and those covered by the COSHH Regulations that colleagues and others within the workplace and location under your control may be exposed to or use;
- Managers must implement checks that identify how substances are purchased or brought in to the workplace and consider and manage if colleagues are bringing in any 'unauthorised' substances;
- Managers need to have the up to date product safety data sheets for all supplied substances;
- Managers must obtain relevant information on substances that are not supplied (e.g. micro-organisms, by-products of processes);
- Managers must ensure that each identified hazardous substance has a completed, reviewed and relevant COSHH risk assessment and where applicable, a Manufacturers Safety Data Sheet (MSDS).
- Managers must communicate the content of the COSHH risk assessment to all colleagues and others who either use or may be exposed to the substance;
- Managers to identify any additional COSHH training and/or information needs is completed;
- Managers need to ensure that the COSHH risk assessments are available and accessible to colleagues using, or exposed to the substance (shared accessible folder / email / printed copies);
- Managers must monitor the arrangements for the effectiveness and use of control measures (E.g. is Local Exhaust Ventilation being maintained / use and condition of Personal Protective Equipment (PPE));
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#### Employee Responsibilities

The Health & Safety at Work Act 1974 section 7 requires all employees to consider their own health & safety and the safety of others.

As an employee of the National Ice Centre, if you have concerns in relation to health & safety that is likely to cause you or someone else, injury or ill health then you must ensure that the concern is communicated to your manager immediately.










You are also required to co-operate with the management of the National Ice Centre to ensure compliance with the health & safety arrangements, policies and procedures and work to the requirements identified within this document.

### Substances Covered By The COSHH Regulations

The initials 'COSHH' stand for the 'Control of Substances Hazardous to Health' and relates to the 2002 regulations which cover the risks associated with substances regarded as being potentially hazardous to health.

#### Substances classified as dangerous to health under the Chemical Classification, Labelling and Packaging Regulations (CLP).

The symbols identified below and the associated table identifying the risk category.

	Dangerous to the environment		Toxic		Gas under pressure
	Corrosive		Explosive		Flammable
	Caution – To be used for less serious hazards like skin irritation		Oxidising		Long term health hazard such as carcinogenic or respiratory sensitization

#### Substances with occupational exposure limits.

Substances with occupational exposure limits are covered within the HSE publication 'EH40' and will be listed with either a Workplace Exposure Limit (WEL) or the Occupational Exposure Limit (OEL).

The safety data sheet for supplied products will detail if it contains substances with a WEL or OEL.

#### Biological agents.

Biological agents such as bacteria and viruses are covered by the COSHH regulations as long as the exposure is directly connected with work or where exposure is incidental to work being undertaken.

#### Any other substance which has a comparable hazard to health.

For technical reasons these may not be covered by CLP, e.g. some pesticides, medicines, cosmetics, or substances produced in chemical processes.

### Substances Not Covered By The COSHH & CPL Regulations

For commercial chemicals, the presence of a warning label will normally indicate that the substance will be covered by the CPL Regulations.

Managers should also understand that not all potentially hazardous substances may have a hazard label.

- There is no warning label on household washing up liquid and there is no requirement to undertake COSHH assessment however, in certain environments, a general assessment may be needed to deal with the people who are present;
- There is a warning symbol on bleach and the requirements of COSHH will apply to the use of bleach at work and an assessment will be required in all circumstances;

Other hazardous substances that are not directly covered by the COSHH Regulations include:

- Asbestos and lead, which have their own regulations;
- Substances which are hazardous because they are either; radioactive, simple asphyxiates, at high pressure, at extreme temperature, or have explosive or flammable properties are covered by other safety legislative requirements;
- Biological agents if they are not directly connected with work and they are outside the employers' control, such as catching a cold from a work colleague.

If you are unsure about whether any substance is covered by the COSHH and CPL Regulations, please contact the NIC Health & Safety Advisor or Corporate Safety Advice.

## COSHH Requirements

To comply with the COSHH Regulation, managers must consider and implement the following actions:

- Assess the risks to health arising from hazardous substances used in or created by work activities;
- Decide what precautions are needed identifying any work that could expose colleagues to hazardous substances which must not be carried out without first undertaking a COSHH risk assessment and implementing the necessary control measures;
- Prevent or adequately control exposure. The first action must always be to prevent exposure or where prevention of exposure is not reasonably practicable then exposure must be controlled.
- Ensure that control measures are used and maintained properly and that safety procedures are followed;
- Monitor the exposure of employees to hazardous substances, if necessary;
- Carry out appropriate health surveillance, where the risk assessment has shown it is necessary or where COSHH sets out specific requirements;
- Ensure colleagues are properly informed, trained and supervised.

## Assess The Risks

The first requirement managers will need to consider is the identification of any substances being used and if it is hazardous.

### **1) Identify the hazardous substances present in your workplace.**

Substances may be supplied for work activities, or created by work activities e.g. fumes, vapour and waste products.

Any new substances being brought into the workplace must first be checked to see if the COSHH Regulations apply and if required, complete a risk assessment out before the substance is purchased or allowed into use.

### **2) Obtain the relevant product Manufacturer Safety Data Sheets (MSDS).**

Suppliers are required to provide a MSDS for all products covered by CLP which will contain the information essential for the correct completion of the COSHH risk assessment.

Following the introduction of CLP, information on data sheets will change and it is recommended that contact is made with your suppliers and new / up to date MSDS are obtained to comply with the requirements of CLP.

### **3) Undertake a COSHH Risk Assessment.**

The COSHH Assessment template is in place to enable assessors to undertake a suitable and sufficient assessment of the use of hazardous substances within the workplace.

This template has primarily been designed for risk assessment of supplied substances, but may also be used for substances that are not supplied (e.g. micro-organisms, by-products of processes).

A specific risk assessment template is also in place for the safe use of needles and exposure to hepatitis b.

Further assistance and support is available from the NIC Health & Safety Advisor or Corporate Safety Advice.

## Who Should Carry Out Risk Assessments

The COSHH Regulations require that managers and others involved in the completion of risk assessments are competent to do so.

It is also important to recognise that other staff, primarily those that use the substances can contribute to the assessment process.

For this purpose, the NIC Health & Safety Advisor & Corporate Safety Advice can provide additional training and on-going support for risk assessors.

## Preventing & Controlling Exposure

For all hazardous substances the first control measure managers must be able to demonstrate is that consideration for the prevention of exposure has taken place.

This prevention can be achieved by:

### Replacing the substance

Where appropriate managers should consider the use of less hazardous substances, or a different form of the same substance (e.g. pellets instead of powder) which present no or less risk to health.

### Changing the process or activity

Managers need to consider if it is appropriate and reasonable to change the process or activity so the hazardous substance is not required or generated.

Where prevention of exposure is not reasonably practicable, managers need to consider what is required to demonstrate that there is adequate control of exposure.

The provision of Personal Protective Equipment (PPE) to colleagues must only be relied upon when it is not reasonably practicable to achieve adequate protection through other control measures which could include some of the following.

- Enclosure of the process;
- Using plant and/or systems of work that minimise the generation of, or suppress or contain, the hazardous substance. Or limit the area of contamination in the event of a spill or leak;
- Partial enclosure and the use of local exhaust ventilation;
- Reducing the number of employees exposed, or reducing the period of exposure.
- Prohibiting eating, drinking and smoking in contaminated areas;
- Ensuring procedures are in place for safe storage, dealing with spillages and correct disposal;
- Controlling the exposure of certain groups- e.g. new and expectant mothers, young workers, employees with medical conditions that may be affected.

## Personal Protective Equipment (PPE)

If it is not reasonably practicable to prevent or adequately control exposure, then managers must ensure that colleagues are provided with suitable PPE appropriate to the tasks and hazards.

This PPE could include the provision and use of face masks, respirators, protective gloves, eye protection, etc.

PPE must only be used when a risk assessment has been completed that identifies the reason that it is required.

The use of all PPE must be formally issued and records of issue must be maintained by managers.

Further information on PPE is provided in the Corporate Safety Manual in *Safety Policy and Arrangements – ‘Personal Protective Equipment’*.

## Monitoring Exposure

In the cases specified below, there will be a need by managers to ensure that measurements of the concentration of hazardous substances in the air have been undertaken:

- Where there could be a serious risk to health if control measures failed or deteriorated;
- If you cannot be sure that exposure limits are not being exceeded;
- If you cannot be sure that control measures are working properly.

Please contact the NIC Health & Safety Advisor or Corporate Safety Advice for further information on potential monitoring methods.

## Health Surveillance

Under the COSHH Regulations, managers will need to ensure that health surveillance is in place for the following:

- Activities where colleagues are exposed to a substance linked to a particular disease or adverse health effect and there is a reasonable likelihood of disease or effect occurring;
- Activities where colleagues are working in certain processes that are specified in Schedule 6 of the COSHH Regulations.

Different substances can require different forms of health surveillance, e.g. blood and urine tests and colleagues must be trained to understand those methods and how they can support the health surveillance programme for symptoms of ill health, etc.

## Information, Instruction & Training

The COSHH Regulations require that managers provide colleagues with suitable information, instruction and training that consider the following matters:

- The nature of the substances they work with or are exposed to and the risks created by exposure to those substances.
- Control measures - their purpose and how to use them (e.g. correct use of Local Exhaust Ventilation or fume cupboards).
- How to use any Personal Protective Equipment provided.
- Results of any exposure monitoring and health surveillance (whilst maintaining individual's confidentiality).
- Emergency procedures (e.g. dealing with spillages, swallowing, skin contact).

The extent of information, instruction and training that is necessary will depend on the level of risk involved in the tasks or substances used.

Whatever information or instruction is provided it is essential that the managers has a formal record of what was disseminated, whether in team meeting minutes or within training records or Performance Appraisals.

Practical ways in which colleagues can be provided with information and instruction in lower risk situations may include:

- Involvement of colleagues in completing and reviewing COSHH Risk Assessments.
- Discussing the findings of COSHH Risk Assessments at team meetings.
- Ensuring copies of COSHH Risk Assessments are kept in a known and accessible location for those colleagues using the substance.

## Review Of COSHH Assessments

COSHH assessments like all risk assessments must not be regarded as a once and for all activity.

Managers need to ensure that COSHH Risk Assessments are reviewed regularly (recommended annually) and specifically at any time where there is evidence to suspect that the information contained within the assessment is no longer valid and/or where there has been a significant change in use of the substance in relation the work that the COSHH assessment relates to.

As part of the regular review, managers must ensure that a CLP compliant product safety data sheet from the supplier is available as this document will contain new or revised information relating to hazards, precautions and other control measures required for safe usage for that substance.

Where required, this will then identify whether the assessment will need to be updated to account for the new information.

## **Registration, Evaluation, Authorisation & Restriction of Chemicals Regulations 2008**

Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations 2008 is often abbreviated to REACH 2008.

REACH 2008 provides for a systematic framework across Europe for the collection of information on the effects of chemicals both to humans and the environment.

This legislation works alongside existing regulations including CLP and COSHH but does not replace them.

REACH 2008 requires all manufacturers in the EU and importers into the EU of chemical substances to register the product with the European Chemicals Agency.

Users further down the line such as wholesalers or retailers are also required to ensure that the products they utilise have been properly registered.

REACH applies to all products which contain chemicals, which are likely under normal use to be exposed to humans or the environment.

## **References & Further Information**

The following information and reference material is in place to assist managers to understand their responsibilities and duties.

### **NIC Documentation**

- [Handling and Disposal of Needles](#)
- [Infection Control](#)
- [Hepatitis B](#)
- [Personal Protective Equipment](#)

### **External References**

- [COSHH Essentials \(HSE Website\)](#)
- [L5 – ‘Control of Substances Hazardous to Health’ \(HSE\)](#)
- [EH40 – ‘Workplace Exposure Limits’ \(HSE\)](#)
- [INDG136 – ‘Working with Substances Hazardous to Health’ \(HSE\)](#)
- [INDG 304 – ‘Understanding Health Surveillance at Work’ \(HSE\)](#)
- [HSG 272 – Using Nanomaterials at Work \(HSE\)](#)
- [Understand Hazards of Nanomaterials \(HSE Website\)](#)
- [Reach – Guidance for the End User – ECHA](#)