



# Phoenix Community Care Ltd Policy & Procedure

## Hazardous Substances (COSHH)

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# Hazardous Substances (COSHH)

## Introduction

This procedural arrangement forms part of section C of the Health and Safety Policy Document. It must be read in conjunction with the procedural arrangements on

- General workplace risk assessment
- Infection control and personal hygiene
- Personal Protective Equipment.

While Phoenix Community Care acknowledges that no substances can be considered completely safe, all reasonable steps will be taken to ensure that all exposure of employees and others to substances hazardous to health is prevented or at least controlled to within statutory limits.

Where exposure identified by the risk assessment cannot be adequately controlled by engineering means, appropriate Personal Protective Equipment (PPE) will be provided free of charge. All persons will be provided with information and instruction on the nature and likelihood of their exposure to substances hazardous to health, and the correct use of PPE's.

The implementation of this procedural arrangement is immediate and requires the total cooperation of management, staff and volunteers.

## Legislation and The Control of Substances Hazardous to Health (COSHH) Regulations 2002

Section 2 of the Health and Safety at Work Act, places a duty on PCC to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees.

Section 2 (2)(b) extends this duty to cover arrangements in connection with the use, handling, storage and transport of articles and substances to ensure that they are safe and free from risk to health. Section 3 requires that PCC must conduct their undertakings in a manner, which ensures that non-employees, such as service users, volunteers, contractors and visitors, are not exposed to health and safety risks posed by hazardous chemicals. Section 7 places duties on employees to take reasonable care of their own health and safety and that of others who might be affected by the things that they either do or fail to do. Employees must also co-operate with their managers as necessary to perform any duty or comply with a requirement of the law.

The COSHH Regulations applies to virtually all work activities or substances, including preparations capable of causing adverse health effects or disease. They may be natural or artificial and exist as a solid, liquid, gas, dust or vapour. Some micro organisms and human endo parasites are also defined as 'substances hazardous to health' under COSHH.

These regulations control the usage of substances that are classified under the Chemicals (Hazard Information and Packaging) Regulations as being Very Toxic, Toxic, Harmful, Corrosive or Irritant. The COSHH regulations also apply to substances which have a maximum exposure limits (MEL). The MEL is the maximum concentration of an airborne substance to which employees may be exposed to by inhalation. It is an average figure over a time-reference period of either 8 hours or 10 minutes, and an occupational exposure standards (OES), and biological agents, airborne dusts and those which have chronic or delayed effects, such as carcinogens, mutagens, teratogens and reproductive poisons (Carcinogens are substances that can cause a growth of abnormal tissue or tumours. Mutagens are substances that may causes in human cells that can be handed down from generation to generation. Teratogens are materials that adversely affect an unborn child and are reproductive poisons impairing the ability to have children.)

No substance that is likely to be harmful to health should be introduced into any workplace until it has been properly assessed and safety measures identified. The COSHH Regulations do not apply to exposures to asbestos, sources of ionising radiation and lead, for which there are special and separate set of regulations. Neither do they apply to substances that are hazardous by virtue of explosive or flammable properties or solely because of high or low temperature or high pressure.

## **Hazards of Substances**

The hazards of substances stem from inherent properties such as: Toxicity, Chemical-reactiveness, Corrosiveness, Infectiousness, Allergenicity and Carcinogenicity. The effect of exposure on someone may be acute, such as would be experienced if a cleaner splashed bleach into their eyes or a maintenance person refilling a wheelchair or car battery spills concentrated acid on their hands. Acute effects usually result from brief exposure and appear very quickly after exposure takes place.

Hazardous chemicals are not confined to one location and some examples of potentially harmful substances at services may include. - Cleaning materials and disinfectants, workshop chemicals, solvents and adhesives used in craft subjects, hardwood dusts, micro-organisms, paints, clinical wastes and spilled body fluids, pesticides, machine oils, fuel oils, plants with toxic parts and animal fur.

Alternatively, prolonged or intermittent exposure to a certain substances may result in chronic effects such as occupational disease and systemic poisoning. It should be remembered that in some cases, two or more relatively harmless substances in reaction produce harmful products. An example is mixing bleach and acidic toilet cleaner to produce chorine gas.

## **Requirements of the Regulations**

PCC must not carry on any work that is liable to expose employees or others to any substances hazardous to health, unless they have made an assessment of the risks to health created by that work and of the steps that must be taken to meet the legal requirements. This specialised risk assessment must be regularly reviewed and amended at any time that there is reason to suspect it is no longer valid or if there have

been a significant change in the work that was assessed.

The purpose of the COSHH assessment is to enable a decision to be made about the measures that are necessary to control substances hazardous to health, and to allow PCC to demonstrate that all relevant factors have been considered. As with the general risk assessments, required by the Management of Health and Safety at Work Regulations, there is considerable flexibility to how the COSHH assessments are performed. For example, assessments may be either activity-based or location based, depending upon which is most convenient.

Clearly not all risk assessments will require a large amount of detailed work in order to be deemed sufficient and suitable. They will depend upon the degree and nature of the risk, the adequacy and suitability of proposed or existing control measures, the knowledge that has been gained as a result of previous experience, the existence of valid records, the nature of the substances involved, the number and categories of the persons exposed to the substances and the consequences of previous exposures. In the majority of cases, it may be only necessary to read suppliers' information sheet on a substance to conclude that existing good practice is sufficient to control exposure. In some cases, it may be necessary to read HSE guidance notes, manufacturer's standards, technical papers, trade literature, guidance from organisations such as RoSPA etc., to carry out a sufficient risk assessment.

In all cases where risk assessment is carried out it must be recorded on the COSHH Risk Assessment Form (Appendix II). The documents must be kept readily accessible to all those who may need to know the results, including staff, volunteers, regional health & safety adviser, health & safety link persons, HSE or Local Inspectors and other third parties.

All assessments must be reviewed at least once a year or when it is suspected that it is no longer valid for any reason such as:-

- an accident/incident or ill-health;
- where there is a significant change in the work and work methods;
- substances used;
- modifications to plant or equipment;
- information on health risks, technological changes and a safer substitute becoming available.

## Prevention or Control of Exposure to Substances Hazardous to Health

Modern working methods involve the use of substances, which may pose a risk to health of people using them. No chemical or substance is completely safe in all circumstances and any airborne dust can damage health.

**The seven key steps to be taken are.**

- (1) Identify the hazards
- (2) Assess the risk
- (3) Eliminate, prevent or control the risk
- (4) Maintain and monitor the controls
- (5) Monitor the health of the workforce
- (6) Ensure the assessments and controls are up to date
- (7) Inform and train those concerned.

PCC ensure so far as is reasonable practicable that the exposure of persons to substances hazardous to health (by any route) is either prevented or adequately controlled.

**To ensure correct control measures are assessed, it is essential to understand the routes of exposure.** These are:

- (1) Inhalation (breathing gas, vapour or dust)
- (2) Ingestion (via the mouth)
- (3) Absorption through the skin or mucous membranes
- (4) Contact with the skin
- (5) Direct entry such as by accidental hypodermic injection or sharps.

**Priority must be given to preventing exposure** when substance such as a carcinogen is used.

This can be achieved by:

- (1) Substitution of the hazardous substance with a new less hazardous substance, or alternatively a different form of the same substance
- (2) Eliminating or reducing risk to health through changing the method of work.

**Control of exposure can be achieved through**

- (1) The use of a total enclosed process and handling system;
- (2) Use of arrangements which minimise, suppress or contain the production or release of hazardous dust, fumes etc.
- (3) Use of partial enclosures such as local exhaust ventilation and general ventilation.
- (4) Reducing the numbers of persons exposed e.g. prevention of non-essential access to any area where exposure could take place;
- (5) Reducing the time during which persons are exposed to a hazardous substance;
- (6) Regular decontamination of walls, floors, work surfaces etc.;
- (7) Safe storage and disposal arrangements for substances hazardous to health;



- (8) Prohibition of eating, drinking and smoking in work areas
- (9) Adequate facilities for washing and storage for personal clothes.

Whatever control measures are determined as appropriate by the risk assessment they must be monitored and tested at appropriate intervals to ensure that adequate control is being achieved.

## **Emergencies**

Local arrangements must be drawn up and agreed for safely and effectively dealing with any accidental leaks, spills of any hazardous substances (if these occur).

## **Use of Personal Protective Equipment**

Full details are to be found in the 'Procedural Arrangement on Personal Protective Equipment'.

When deciding on the most appropriate control measures, risk assessors must be aware that PPE should always be considered as a last resort (e.g. fixed screens should be used to protect the eyes rather than goggles where practicable). Sometimes PPE will be necessary wherever the risks cannot be adequately controlled by other means and the PPE Regulations will be applicable.

The reasons for this are: PPE protects only the person wearing it, while measures controlling the risk at source protect everyone.

To be fully effective PPE must be properly selected, correctly fitted and used in the appropriate manner and adequately maintained. The actual level of protection afforded by PPE is often difficult to assess under all circumstances and the wearing of some forms of PPE can restrict the user (by limiting mobility, vision). Because of these factors, PPE is at the bottom of the 'hierarchy of control measures'.

## **Health Surveillance**

If there is any doubt whether any persons at a service will need to be under health surveillance then advice should be sought from the Head of Health and Safety or the Regional Health and Safety Adviser. It is unlikely that this will need to take place in most cases and hence full details are not given in this procedural arrangement. Reference should be made to pages 23 to 28 of the HSC's COSHH Approved Code of Practice.

## **Provision of Information, Instruction and Training**

PCC will provide appropriate training for those who have been identified as assessors, and will provide other employees, service users and volunteers who may be exposed to substances hazardous to health with suitable and sufficient information, instruction and training.

This information will include:

- the nature and degree of the risks to health and associated factors;
- the nature of and reasons for the control measures and how they are properly used;
- why and when PPE must be used;
- monitoring and checking procedures,;
- arrangements for reporting and responding to problems (including emergencies),;
- details of any health surveillance arrangements.

## **Duties of Manufacturers and Suppliers of Equipment**

The manufacturer and supplier of any hazardous substances have legal duties under Section 6 of the HSW Act, to provide purchasers with adequate information on their products. The person placing the order must automatically request copies these.

## **Safe Systems of Work**

PCC will implement the following:-

- An inventory of all substances hazardous to health, to be kept on site and be updated as necessary, together with appropriate manufacturers hazard sheets/information.
- Competent persons will be appointed to carry out COSHH risk assessments using the pro-forma that is attached to this procedural arrangement.
- All operations that involve or may involve exposure to substances hazardous to health, will be assessed and appropriate control measures will be identified, and if possible elimination or substitution of the hazardous substances made.
- Engineering controls will be properly maintained and monitored to ensure their continued effectiveness. This will be achieved by planned preventive maintenance and annual monitoring.
- All employees and others, who may work in the affected area, will be informed of the purpose and safe operation of all engineering controls.
- All PPE purchased will conform to EC standards and have approved EC endorsed on them.
- PPE will be used as a last resort or as a back up measure during testing or modification of other controls.
- All those who have been issued with appropriate PPE will ensure FULL COMPLIANCE OF USE; otherwise disciplinary action will be taken for any breaches.
- The type and use of PPE will be carefully assessed and maintained according to manufactures' instructions. Where possible, the number of different types will be minimised to prevent mistakes with servicing or replacement.
- Each assessment will be reviewed and amended annually.
- Qualified professionals, if indicated by an assessment, will carry out health surveillance of staff and volunteers.
- The records of employees and volunteers who have been exposed to hazardous substances will be kept for a minimum of 40 years.
- All employees and others will be provided with appropriate information and training on the nature of the substances, work methods and PPE's.
- All changes to control measures and changes of PPE will be properly assessed and no new substances will be introduced into the workplace without prior assessment.





## APPENDIX I Further Reading

Your initial hazard spotting exercise will indicate which of the following publications (if any) you will need to have access to in order to perform a valid COSHH assessment.

A Step by Step Guide to COSHH Assessment		HSE	ISBN 0-11-886379-7
Biological Agents Approved Code of Practice		HSC	ISBN 0-7176-0819-0
Carcinogens Approved Code of Practice		HSC	ISBN 0-7176-0819-0
Chemicals (Hazard Information and Packaging) Regulations		HSC	ISBN 0-11-882155-5
Classification and Labelling of Substances Dangerous for Supply		HSC	ISBN 0-11-883990-X
Control of Substances Hazardous to Health in the Production of Pottery		HSC	ISBN 0-7176-0849-2
EH40 - Occupational Exposure Limits		HSE	ISBN 0-7176-0876-X
Essentials of Health and Safety at Work		HSE	ISBN 0-7176-0716-X
General COSHH Approved Code of Practice		HSC	ISBN 0-7176-0819-0
Hawley's Condensed Chemical Dictionary	Sax & Lewis		ISBN 0-442-28097-1
Hazardous Chemical Handbook		P A Carson & CJ Mumford	
Industrial Toxicology	Williams & Burson		ISBN 0-442-23541-0
Management of Health and Safety at Work Regulations		HSE	ISBN 0-11-886330-4
Monitoring for Health Hazards at Work	RoSPA		ISBN 0-862286-029-6
Personal Protective Equipment at Work Regulations		HSE	ISBN 0-11-886334-7
Record Keeping Book for COSHH	Croner Publications Ltd.		
Respiratory Protective Equipment - A Practical Guide for Users		HSE	ISBN 0-11-885522-0
Safety in Swimming Pools		HSC	ISBN 0-906577-83-7
Substances Hazardous to Health	Croner Publications Ltd.		
Substances Hazardous to Health Emergency First-Aid Guide	Croner Publications Ltd.		
Substances Hazardous to Health Emergency Spillage Guide	Croner Publications Ltd.		
The Control of Legionellosis		HSE	ISBN 0-11-882150-4
The Prevention or Control of Legionellosis		HSC	ISBN 0-7176-0732-1
The Safe Use of Pesticides for Non-Agricultural Purposes		HSC	ISBN 0-7176-0542-6
Woodworking Health & Safety Information Pack		HSE	WOODNIG



## Hazardous Material Risk Assessment Record

Process Activity				
Describe the process: (Attach safe systems of work if present)				
Where is it done:		How often		
How long does it take		How many people will be exposed		
What Equipment is used in the process/activity				
Details of material				
Trade Name		Single Substance	Mixed Substance	
Name and Address of Supplier				
Ref Nos:		Emergency Tel:		
Main Constituents	Percentage Concentration	MEL	OES	
Hazard Warnings (Tick Boxes)				
Very Toxic	Toxic	Corrosive	Irritant	Harmful
Flammable	Flammable	Oxidising	Explosive	Infectious
Possible Entry Routes (Tick Boxes)				
In-halation (Lungs)	Ingestion (Mouth)	Absorption (Skin)	Skin Contact	Direct Entry
State of material under Normal Conditions (Tick Boxes)				
Solid	Liquid	Gas	Biological	Mixture
Other significant hazards and properties				



<b>Storage</b>				
Location			Amount	
Conditions				
Purpose and frequency of use / Persons at Risk				
Purpose				
Frequency of use				
Duration of use				
Used by				
Training, Information and Instruction provided				
Details of Personal Protective Equipment Issued				
Summary of Manufacturers / Suppliers recommendations				
Present Methods of Handling and Usage				
First Aid Procedures				
Dealing with Spillages / Releases / Fires and other emergencies				
Hazards Identified Severity of Outcome and those affected				
Possibility of Harm, taking into account existing control measures (please circle)				
Unlikely	Improbable	Likely	Highly probable	Certainty

**Necessary changes identified by this assessment**

**Conclusion** Tick one box only

1	2	3	4	5
The risks are insignificant now and it is not reasonable foreseeable that they could increase in the future	The risks are high now and not adequately controlled	The risks are controlled now but could become greater in the future	Uncertain about the risks, nature of the hazard is known but unsure about the degree or extent of exposure	Cannot decide about the risk. Not enough information
Inform Staff and others set review date	Inform staff and others, consider stopping the activity, formulate action plan and set review date	Inform staff and others set early review date, verify safe system of work	Inform staff and others consider stopping the process activity formulate action plan to obtain more information and set early review date.	Inform staff and others consider stopping the process activity formulate action plan to obtain more information and set early review date.
Other Remarks				
Name of Assessor			Designation	
Signature				
Date of Assessment			Review date	



## Summary Sheet

Location	Assessment Ref	Department	Date

Hazard		Refer to EH40 Book
Substances (Included Impurities)	Hazards to Health	SK/SEN

### Personal Protective Equipment (Specify Protection & Facilities In Addition To Site Minimum)

<b>Type</b>	<b>Equipment</b>
Respiratory Protection	
Gloves	
Safety Glasses / Visor / Goggles	
Coveralls	
PVC Suits	
Splash Shield	
Welfare / Washing Facilities	
<b>Emergency Response on Incident</b>	<b>Equipment Facilities</b>
<b>First Aid Measures</b>	
Contact with eyes	
Contact with skin	
By Inhalation	
By Ingestion	
<b>Name of Assessor</b>	<b>Signature</b>



## **Pest Control Report**

Name of Operator

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Date treatment carried out

---

Address Site of application

---

Areas to which applied

---

Product used

---

Weather conditions if applicable

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Other relevant details