

# Control of Substances Hazardous to Health (COSHH) Procedure

## Objective

The purpose of this procedure is:

- To ensure that the necessary use of substances hazardous to health is safe and controlled.
  - To ensure that staff, students and visitors are not put at risk by the use of hazardous substances whilst working or studying at Cardiff and Vale College.
  - To ensure that staff and students who may be required to use substances hazardous to health in the workplace receive appropriate guidance, instruction, information and training in the safe use of such substances.
- Scope** - This procedure applies to all members of staff, learners and visitors.

## Legislative Responsibility

The Health and Safety at Work etc Act 1974 (HASAW) places a duty on employers to ensure the health safety and welfare at work of employees and any non employees who may be affected by its acts or omissions. The Control of Substances Hazardous to Health regulations 2002 (as amended) places specific duties on employers and employees with regards to the safe use of substances hazardous to health in the workplace. The COSHH regulations require employers to:

- Carry out a suitable and sufficient risk assessment of any work activities involving hazardous substances.
- Provide measures to eliminate or reduce risks, as far as are reasonably practicable.
- Provide equipment and procedures to control exposure.
- Monitor exposure at the workplace where a significant risk has been identified.
- Carry out health surveillance where there is an identified risk to the employee.

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- Provide information, instruction, training and supervision for employees using or exposed to substances hazardous to health.
- Put arrangement in place to deal with accidents, incidents, spillages and emergencies.

## Definitions

A substance hazardous to health is defined as:

- Any substance that is classified as very toxic, toxic, harmful, corrosive, or irritant under product labelling legislation.
- Any substance allocated a workplace exposure limit by the HSE as detailed in EH40;
- Biological agents (micro organisms, cell cultures or human endoparasites);
- Other dusts of any kind, when present at a concentration in air equal or greater than 10 mg/m<sup>3</sup>;
- Any other substances creating a risk to health because of its chemical or toxicological properties and the way it is used or is present at the workplace.

## How Harm May Occur

A substance can cause harm to a person in a number of ways depending on the substance being used and the process being carried out. Routes of entry are defined as follows:

- Inhalation of fumes, substances, dusts or organisms.
- Ingestion of a product which may cause ill health or poisoning.
- Contact of a substance by allowing the substance to pass through the skin.
- Injection of a substance through the skin.

## Material Safety Data Sheets

It is essential that a Material Safety Data Sheet (MSDS) is provided and kept on record for each identified substance hazardous to health. Safety data sheets should be provided by suppliers when purchasing products and should be updated periodically. Any member of staff involved in purchasing substances hazardous to health must request an MSDS and keep a record of all MSDS's within the department. MSDS's provide information on the safe use of the product, the hazards inherent from the product including any potential

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harm that could be caused and any control measure required to reduce the risks from such hazards. The MSDS will be used as part of the risk assessment process. Copies of all MSDS's must be forwarded to the Health and Safety team to allow them to update the data base.

## Conducting a COSHH Risk Assessment

The Health and Safety team will assist line managers to carry out a suitable and sufficient risk assessment of all substances hazardous to health identified within their sections. Risk assessments will be carried out using the COSHH Essentials software which is accessible at the following web address <http://www.coshh-essentials.org.uk/>. Training will be provided for those staff responsible for carrying out risk assessments by the Health and Safety team. Completed risk assessments must be kept on file and a copy sent to the Health and Safety Manager via email.

The Health and Safety team will maintain a database to record all risk assessments, safety data sheets and guidance on the control measures of all substances hazardous to health used within the college. The database will be made accessible to all relevant staff on a common drive.

Most sections/departments will use substances hazardous to health, some only on minor scales but many such as engineering, creative design, sciences and construction on a major scale. Copies of risk assessments must be accessible in the place of work where the substance hazardous to health is being used. Any substance identified during the risk assessment process as high risk (D-E-F) must have the approval of the Health and Safety Manager before the product is used at Cardiff and Vale College.

**NOTE: It is expected that persons proposing to use any high risk substance will be able to demonstrate competency in COSHH and will be aware of the provisions of the COSHH regulations.**

## Prevention or Control of Exposure

The COSHH regulations require that exposure is prevented, or, if prevention is not practical, exposure is controlled to the lowest possible level and in every case, below the levels specified in EH40 or other authoritative guidance.

Control can be achieved by using the following hierarchy:

- Changing the work or the process to eliminate the harmful element.
- Substitution of the harmful substance for one less harmful.
- Use a safer form (e.g. pellets instead of powder).
- Enclose the work (fume cupboards etc.).
- Control exposure via engineering (LEVs).
- If reasonable or for low risk work, use of personal protective equipment (gloves, goggles, respirators etc).

Wherever possible at CAVC exposure will be prevented or reduced using the above hierarchy of control, where a residual risk still remains personal protective equipment will be utilised by staff and learners. Where through the risk assessment process personal protective equipment has been identified as a control measure, training and instruction will be provided to ensure PPE is used correctly. The wearing of PPE will be enforced by the lecturers, technicians and line managers.

## Monitor the Exposure

The monitoring of exposure for a substance hazardous to health is carried out to ensure control measures, identified during the risk assessment process, are working and adequate control is provided. The publication EH40 which supplements the COSHH regulations provides workplace exposure limits (WEL) for many substances hazardous to health. Where a WEL exists exposure levels can be monitored using a variety of techniques to measure levels of exposure.

The Health and Safety team will carry out periodic monitoring wherever practical and where resources allow. Where in-depth or more scientific monitoring is required the Health and Safety Manager will engage a specialist from an appropriate external agency.

Monitoring will be carried out at time scales relevant to the risk identified.

## Health Surveillance

Schedule 6 of the COSHH regulations identifies certain occupations/activities that require periodic medical health surveillance. In addition to the occupations identified in schedule 6 appropriate health surveillance is also

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required for substances of recognised systemic toxicity. (Substances that can be inhaled, absorbed through the skin or swallowed, known to cause occupational asthma, known to cause severe dermatitis).

Whilst CAVC carry out no activities listed in Schedule 6, a number of departments or areas carry out activities using substances that can be inhaled, absorbed through the skin, swallowed, cause occupational asthma and severe dermatitis.

The risk assessment process will identify such health hazards and health surveillance will be arranged for employees that have been identified as at risk.

The Health and Safety team will identify with line managers, employees at risk and will forward details to the Human Resources (HR) team who will coordinate health surveillance annually.

## Inspection and Testing of Control Measures

Where control measures such as local exhaust ventilation (LEV) or fume cupboards (containment) has been put in place, such controls must be periodically tested and inspected to ensure that appropriate control is maintained:

- Systems must be visibly checked weekly by users to ensure that the system is operating appropriately.
- Statutory examined and tested every 14 months by a competent person (in the college case the competent person is the college insurance company).
- Systems must also undergo annual maintenance to address any issues identified by the competent person.

Simple records of weekly checks must be kept by the workshop technician and records for statutory testing and maintenance will be kept by the Health and Safety Manager.

## Biological Hazards

There are a few areas of the college where employees, learners and members of the public may be exposed to minor biological hazards. Nursery, First Aid persons, Premises and Learning Support staff participate in activities

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which could expose them to human waste on a daily basis. Although classified as low risk, the risk assessment will need to identify appropriate control measures for those staff exposed to biological hazards which may include training, containment, hygiene advice, PPE and vaccination programmes.

## Disposal of Hazardous Waste

The disposal of hazardous waste is controlled by the Hazardous Waste Regulation (England and Wales) 2005. Any hazardous waste produced by CAVC must be disposed of in line with the above legislation. The Premises and IT department coordinates all hazardous waste disposal.

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**Approved by:** H&S Committee

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**Review date:** 30 June 2016

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**Responsible Manager:** Health and Safety Manager

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**Executive Lead:** : VP Resources, Efficiency and Financial Planning

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**Accessible to Students:** : Yes

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