



Leicester  
City Council

# **COSHH – Hazardous Substances Health & Safety Management Standard Issue 2 (September, 2010)**

## **Introduction**

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This document contains corporate standards and guidance on the management of risks arising from the use of hazardous substances. It is the responsibility of managers to ensure hazardous substances are managed in line with this document in any area under their control.

This document must be read in conjunction with any additional guidance specific to Divisional issues or activities.

## **Managers' Checklist – Hazardous Substances**

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The checklist given below identifies key actions involved in managing the health and safety risks arising from the use of hazardous substances. Further information on each of these points are contained in this document.

1. Have all hazardous substances been identified?
2. Are any Divisional-specific arrangements for purchasing hazardous substances known and understood?
3. Has a risk assessment been carried out on all hazardous substances?
4. Is it possible to prevent exposure to hazardous substances?
5. If it is not possible to prevent exposure to hazardous substances, have appropriate controls been identified that will adequately control exposure?
6. Has any need for exposure monitoring or health surveillance been identified?
7. Have individuals who use, or are exposed to, hazardous substances been provided with adequate information, instruction and training?
8. Are there arrangements in place to monitor the use of control measures?
9. Are COSHH risk assessments regularly reviewed?
10. Have the issues arising from contractors and their use of COSHH substances been considered?

## Identifying COSHH Substances

The acronym 'COSHH' stands for 'Control of Substances Hazardous to Health'. The purpose of the COSHH Regulations is to prevent ill health caused by exposure to hazardous substances at work.

Under the COSHH Regulations there are a range of substances regarded as being hazardous to health:

- **Substances classified as dangerous to health under the Chemicals (Hazard, Information and Packaging for Supply) Regulations (CHIP)**  
Substances covered by CHIP can be identified by a square orange warning symbol displayed on the packaging label. Suppliers must provide a Safety Data Sheet (SDS) if the substance is covered by CHIP. Some of the most common CHIP labels are shown below.



- **Substances with Workplace Exposure Limits (WELs)**  
A WEL is the maximum concentration of an airborne substance, averaged over a known period of time, that individuals may be exposed to. Substances with WELs are listed in the Health and Safety Executive (HSE) publication EH40 and will also be detailed on the SDS.
- **Biological agents (bacteria and other micro-organisms)**  
Biological agents are covered by COSHH if they are directly connected with work or if exposure is incidental to work. Examples of activities in which there may be this kind of exposure are health care, refuse disposal, agriculture and work involving contact with sewage.
- **Dust concentrations**  
Any kind of dust, if its average concentration in the air exceeds the levels specified by COSHH, is considered to be hazardous to health. (10 mg/m<sup>3</sup> of inhalable dust, or 4 mg/m<sup>3</sup> of respirable dust. Please contact your allocated Health & Safety (H&S) Team for further advice if airborne dust levels are thought to be a potential issue.)
- **Any other substance that creates a risk to health**  
For technical reasons these may not be covered by CHIP. These substances include; asphyxiants (i.e. gases such as argon and helium, that while not dangerous in themselves can endanger life by reducing the amount of oxygen available to breathe), some pesticides, medicines, cosmetics and substances produced in chemical processes. Also included would be other substances that may be a cause of occupational asthma (these would be assigned either R42 or R42/43 as risk phrases on the SDS).

### **Do different forms of the same substance present different hazards?**

A substance may be hazardous in one form but not in another. For example, a piece of hardwood poses no risk in itself. However, hardwood dust created during sanding does present a hazard. Therefore, if a substance is not being used in a form that is hazardous to health and the work process does not create by-products that are hazardous to health; it does not need a COSHH assessment.

### **What substances are not covered by COSHH?**

Not all substances are covered by the COSHH Regulations. For the vast majority of commercial chemicals the presence (or not) of a CHIP warning label will normally indicate whether the substance is covered by the COSHH Regulations. For example:

- There is no warning label on water based marker pens, 'pritt-stick' type glue pens or ordinary household washing-up liquid. Therefore, the COSHH Regulations do not apply.
- However, there is a CHIP warning symbol on many types of bleach, so the requirements of COSHH do apply to those types of bleach.

Other substances that are not covered by the COSHH Regulations are:

- Asbestos and lead, which have their own regulations.
- Substances that are hazardous only because they are; radioactive, at high pressure, at extreme temperature, or have explosive or flammable properties. (Other regulations apply to these risks.)
- 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 if a substance is covered by COSHH please obtain a SDS from the supplier, or contact your allocated H&S Team.

## **Purchasing Hazardous Substances**

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Some LCC Divisions operate purchasing systems that control what can be purchased. These arrangements may include the purchasing of commercial chemicals that may be covered by COSHH.

### **Employees Bringing In Hazardous Substances**

Employees are not permitted to bring in their own substances to use at work. If a substance is required for work purposes, the line manager should ensure that it is supplied and risk assessed wherever necessary.

## **Carrying Out COSHH Risk Assessments**

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After identifying the hazardous substances that employees will use (or which they will be exposed to) the next stage is to carry out a COSHH risk assessment.

Within LCC it is the responsibility of managers to ensure that COSHH risk assessments have been carried out on hazardous substances within their area of control (see 'Purchasing Hazardous Substances'). Managers can either carry out COSHH risk assessments themselves, or delegate this task to individuals within their area. If a manager delegates the task of carrying out a risk assessment, they must ensure that the

person(s) is competent to carry out the assessment and takes all reasonable care when doing so.

To assist in this process, a COSHH Risk Assessment form is provided with this document. Please note that the form is primarily intended for the assessment of commercial chemicals.

COSHH risk assessment training courses by H&S Services are available via City Learning. Records of training should be kept in accordance with Divisional Procedures.

## Preventing Exposure

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For any hazardous substance, the first control measure that must be considered during the risk assessment is to prevent exposure. Prevention of exposure may be achieved by:

- Replacing the hazardous substance with a non-hazardous substance.
- Changing the method of work, so that the task or operation that involves exposure is no longer necessary.
- Modifying the process, to eliminate the production of hazardous by-products or waste products.

In many areas it will not be possible to eliminate hazardous substances completely. Where the use of hazardous substances is necessary, consideration must still be given to reducing the risks to employees by using;

- an alternative less hazardous substance; or
- a different form of the same substance (e.g. pellets instead of powder); or
- a different work process.

Suppliers will often be able to provide advice on non-hazardous and less hazardous alternatives that are available (see 'Purchasing Hazardous Substances').

## Controlling Exposure

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If it is not reasonably practicable to prevent exposure (i.e. all the costs of preventing exposure outweigh all the potential health benefits) the exposure to the substance must be controlled to a level that will not harm health (e.g. below any relevant WEL for the substance).

Control measures appropriate to the activity should be considered and put in place, including (in order of priority) one or more of the following:

- Put appropriate work processes, systems and engineering controls in place, and provide suitable work equipment and materials (e.g. use processes that minimise the amount of substance used or produced).
- Control exposure at source (e.g. use local exhaust ventilation) and reduce the number of employees exposed to a minimum, the level and duration of their exposure, and the quantity of the hazardous substance used or produced.
- Provide Personal Protective Equipment (e.g. gloves, face masks, etc.), but only as a last resort and wherever possible in combination with other control measures. (Please note that separate guidance is available on the selection and maintenance of PPE. See also 'Ensuring Control Measures Are Used And Maintained' below.)

## **Occupational asthma**

The COSHH Regulations require additional controls for substances that can cause occupational asthma. If a substance is identified as being a cause of asthma (check for the risk phrases R42 and R42/43 on any relevant SDS) please contact your allocated H&S Team for further advice.

## **Carcinogenic and mutagenic substances**

The COSHH Regulations require additional controls for carcinogenic and mutagenic substances. If a substance is identified as being carcinogenic and mutagenic (check for the risk phrases R45, R46 and R49 on any relevant SDS) elimination of the substance must be achieved if at all practicable. Please contact your allocated H&S Team for further advice.

## **Monitoring Exposure**

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Under COSHH, employers are required to measure the concentration of hazardous substances in the air, in any of the following circumstances:

- Where the failure or deterioration of controls could result in a serious health effect.
- When measurement is necessary to ensure that the WEL for the substance is not being exceeded.
- As an additional check on the effectiveness of any control measures.
- Where changes in the nature of employees' exposure could mean that existing controls are not adequate (e.g. change in work method, increase in the amount of a substance used).

If you think that exposure monitoring may be necessary, please contact your allocated H&S Team for further information.

## **Health Surveillance**

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The Health and Safety Executive give the following definition of health surveillance:

'Health surveillance is about putting in place systematic, regular and appropriate procedures to detect early signs of work-related ill health among employees exposed to certain health risks; and acting on the results.'

Under the COSHH Regulations health surveillance is required where:

- Employees are exposed to a substance linked to a particular disease or adverse health effect, and there is a reasonable likelihood of disease or ill health occurring.
- Or, an employee is working in certain processes that are specified in Schedule 6 of the COSHH Regulations (none of which apply to activities carried out by LCC at this time).

Further advice on health surveillance is available in the separate Corporate H&S Management Standard, or from your allocated H&S Team.

## Information, Instruction And Training

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The COSHH Regulations require that employees who use or who are exposed to hazardous substances, are provided with suitable information, instruction and training. The information, instruction or training that is provided should address the following issues:

- The names of the substances and the risks to health.
- Any relevant WEL.
- The precautions to be taken by employees.
- The results of any exposure monitoring.
- The purpose and collective results of any health surveillance.
- The importance of good hygiene standards.
- Relevant information arising for risk assessment being reviewed.
- Procedures for dealing with accidents, incidents and emergencies (see 'Emergency Procedures' below).

The extent of information, instruction and training that is necessary will depend on the level of risk involved. Practical ways in which employees can be provided with information and instruction:

- Involve staff in undertaking or reviewing COSHH Risk Assessments.
- Discuss the findings of COSHH Risk Assessments at team meetings.
- Ensure copies of COSHH Risk Assessments (and relevant Safety Data Sheets) are kept in a known and accessible location.
- Ensure COSHH Risk Assessments are viewed by employees prior to a new substance being used for the first time.

Attached to this document is a blank 'COSHH - User Information Sheet'. If no other system is in place to provide information to employees, the 'COSHH - User Information Sheet' should be completed for each hazardous substance and a copy provided to the employees involved.

Records of information, instruction or training should be kept in accordance with Divisional Procedures.

## Ensuring Control Measures Are Used And Maintained

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COSHH requires that employees make proper use of control measures and report any defects. It is the responsibility of managers and supervisors to take all reasonable steps to ensure that they do. For example, if an employee is not using PPE provided, the reason for it not being worn should be discussed with the employee and a remedy found (e.g. providing a different size if it is too small or large).

If engineering controls are used (e.g. local exhaust ventilation) the equipment must be regularly inspected, tested and maintained. Regular testing of equipment such as local exhaust ventilation is especially important, as it is the only way to ensure that the equipment is working properly.

**Please note.** All non-disposable types of PPE have a limited lifespan. For example, respiratory protective equipment should be examined and tested at regular intervals. The

manufacturer or supplier will have provided information about the examination, testing and replacement of PPE. If you are unsure please contact the PPE supplier or your allocated H&S Team.

## **Reviewing COSHH Risk Assessments**

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The risk assessor needs to decide how often a risk assessment should be reviewed. Review does not necessarily mean carrying out a new risk assessment, but checking over the existing risk assessment to ensure it is still valid and that any changes are documented on the risk assessment.

COSHH risk assessment should always be reviewed immediately:

- When there is evidence that it may no longer be valid (e.g. as a result of monitoring exposure, from the results of health surveillance, where the WEL has changed, etc.).
- Where there has been a significant change to the work or activity (e.g. change of process or method of work, the volume used, changes of substance involved in the process, etc.).

Risk assessment reviews should always re-consider if it is practicable to prevent exposure or use a less hazardous substance. Reviews should also reconsider the control measures that are in place and whether they can be improved.

## **Contractors And COSHH**

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Like any employer, contractors are required to ensure that their use of hazardous substances does not harm their employees or other people who may be exposed (e.g. LCC employees or service users if the substances are being used on in an LCC premises).

Managers in control of premises should ensure that they are aware of any COSHH substances that contractors will be using on the premises, so that they:

- Are satisfied that the contractors' control measures will protect LCC employee, service users, pupils, etc. (E.g. by asking for copies of the COSHH risk assessments for any hazardous substances they are using on the site.)
- Can provide LCC employees with information about any hazardous substances being used by contractors.
- Can reassure LCC employees that any exposure to hazardous substances and any risks to their health are being properly controlled.

If a manager is concerned that a contractor is working in an unsafe manner (e.g. not in accordance with the contractor's own risk assessments or method statement) they should:

- Raise their concerns as soon as possible with the contractor's representative on site.
- If concerns remain, contact the Property Help Desk (Ext. 8080) for further advice.

## Emergency Procedures

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The COSHH Regulations require that formal emergency procedures are developed when incidents involving hazardous substances could lead to exposure well beyond the normal day-to-day levels. Examples of events that would need formal emergency procedures are:

- Serious process fires that would give rise to serious risk to health.
- Serious spillages of floods of corrosive agents liable to make contact with employees' skin.
- Any acute process failure that could lead to a sudden release of chemicals.
- Any significant over-exposure to a substance with a WEL, e.g. as the result of failure of an LEV system or other controls.

If any of these apply to processes or activities in your area, please contact your allocated Safety Team for further advice.