



C.O.S.H.H. POLICY

**THE CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH
REGULATIONS 2002**

INTRODUCTION

The COSHH Regulations provide a framework to help employers protect people in the workplace against health risks from hazardous substances. These may be used directly in the work, like paints, cleaning materials and chemical reagents, or they may arise from the work, like dusts, fumes and waste products. Others occur naturally, such as fungal spores in agriculture.

COSHH applies to virtually all substances hazardous to health. Some exceptions being asbestos and lead, which have their own regulations, and substances which are hazardous only because they are radioactive, asphyxiates, at high pressure, at extreme temperatures, or have explosive or flammable properties. Micro-organisms are excluded if they are not directly connected with the work and they are outside the employer's control.

The risk of health hazards arising from any particular substance will depend on:

- the hazard presented by the substance,
- how it is used,
- how exposure to it is controlled,
- how much of the substance people are exposed to and for how long,
- whether people are particularly vulnerable to it,
- the work being done.

There can be a substantial risk even from a substance that is not particularly hazardous if exposure is excessive. But with proper precautions the risk of being harmed by even the most hazardous substances can be very small.

COMPLYING WITH COSHH INVOLVES:

- assessing the risks to health arising from the work,
- deciding what precautions are needed,
- preventing or adequately controlling the risks,
- ensuring that control measures are used and maintained properly, and that any safety procedures laid down are followed,
- monitoring exposure of workers to hazardous substances and carrying out appropriate health surveillance where necessary,
- Informing, instructing and training employees about the risks and the precautions needed.

Management Responsibilities

1. To ensure that all hazardous substances stored, used or produced by Margaret Cleaning Solutions Ltd are assessed with regards to the hazards they present

and that remedial actions are taken to eliminate, reduce or control those hazards.

2. To ensure, that where a workplace in which specific dust and fume hazards exist they are suitably controlled. This policy does not apply to airborne particulate from asbestos, which are dealt with under a separate policy.
3. To consider the Health and Safety of each individual who will come into contact or use the hazardous substances they introduce into the manufacturing process and/or product.
4. To fully investigate all possibilities and only use hazardous substances when no safer alternative is available.

Technical Services/Site Services/Facilities Depts. Responsibilities

1. Where a hazard exists, ensure that a risk assessment is made to determine:
 - if the use of a less harmful toxic substance or a modification to a process (substitution) may minimize or eliminate the hazard,
 - if the use of a wet process (suppression) is an effective form of control (only if the hazard is a powder or other particulate).
 - if enclosure of all or part of a process or the actual point of dust production (isolation) is an effective form of control,
 - Where substitution, suppression or isolation are not feasible an effective local exhaust ventilation (LEV) system is provided (in preference to, but not necessarily exclusive of, personal protective equipment).
2. To ensure that all contaminants are identified, by reference to manufacturers' or suppliers' Safety Data Sheets.
3. To seek the advice of the Safety Department in relation to the hazards of the contaminant.
4. To confirm that the exposure levels are permissible by law (Occupational Exposure Limits).
5. To ensure that all LEV systems are regularly tested, serviced and maintained at no less than 12 month intervals, so that they perform to specification,
6. To provide equipment and facilities for the safe use, handling and storage of hazardous substances.
7. To ensure that the Health and Safety Department are consulted about the introduction of any such substance. This consultation process will only be conducted on receipt of the substances:
 - Material Safety Data Sheet
 - Product data sheet.
 - A description of the process in which the substance is to be used.
8. All control measures must be put in place prior to any substance being introduced to the workplace.

Supervisions Responsibilities

1. To ensure that persons do not use or handle hazardous substances without the correct information, instruction, training and supervision the level of which must take into consideration their age and experience.
2. To make all operators aware of and ensure they understand the hazards and the measures being taken to control them and that:

- Where LEV alone does not provide complete protection or is possible, suitable personal protective equipment is used.
 - Any supplementary personal protection equipment provided is properly used and efficiently maintained.
 - The LEV is properly used and any deficiencies are promptly reported.
 - Any dangerous occurrences are reported.
3. To plan and implement work patterns so as to ensure that Occupational Exposure Limits are not exceeded.

Purchasing Departments Responsibilities

1. Not to process any purchase requisition, which pertains to a hazardous substance unless written permission, has been granted by the Health and Safety Department.
 - New products require a full report.
 - Existing products can be authorised through the e-mail system.

Employee Responsibilities

1. To make themselves familiar with and comply fully with the control measures identified for the safe use, handling and storage of the hazardous substances they come into contact with.
2. To comply fully with any training given.
3. To check, maintain and use correctly the appropriate personal protective equipment required for each substance.

Health and Safety Departments Responsibilities

1. To collate and maintain a comprehensive list of the hazardous substances used in our cleaning activities and copies of their material safety data sheets.
2. To present the information contained in the material safety data sheets for use by all employees.
3. To advise all departments on the measures required to ensure the health and safety of the individuals who use, handle or store hazardous substances.
4. Provide specialist advice on the requirements of legislation, Approved Codes of Practice, Company Guidelines and risk assessment relating to airborne contaminants,
5. Provide specialist advice on the harmful effects of contaminants and exposure limits,
6. Advise if a health-monitoring programme is needed and, if so, define and provide its requirements.
7. Advise on the Personal Protective Equipment requirements of all substances.

Training Departments Responsibilities

1. To develop a training program for all employees to ensure they are aware of their responsibilities as defined in the Control of Substances Hazardous to Health Regulations 1999 and the policies of Margaret Cleaning Solutions Ltd.
2. To deliver this training to all those individuals who are identified as requiring COSHH training.
3. To deliver training on the use, storage and maintenance of all PPE.

ASSESSMENT

The responsibility for the assessment rests with the employer, even where others do some or even most of the work of preparing it on the employer's behalf. The person carrying out the assessment will need to:

1. Have access to the COSHH Regulations and Approved Codes of Practice,
2. Understand the requirements of those Regulations and Codes of Practice,
3. Have the ability and authority to get the necessary information and make correct decisions about the risks and the precautions needed.

We the employer will ensure that relevant sections of the workforce are fully involved in the assessment process and that they are informed of the findings.

When undertaking assessments it is important to consider whether it is reasonably foreseeable that accidental leakage, spillage or release could occur through breakdown of the plant or controls, or through operator error. Also activities such as cleaning and maintenance should not be overlooked.

FOLLOW UP ACTION

If the assessment concludes that there is no likelihood of risk to health, the assessment is complete and no further action need be taken but if the conclusion is that there are risks to health, it is necessary to decide what action needs to be implemented.

Where reasonably practicable exposure should be prevented by:

1. Changing the process or activity so that the hazardous substance is not required or generated, or
2. Replacing it with a safer alternative, or
3. Using it in a safer form, for example pellets instead of powder.

If prevention is not reasonably practicable then exposure must be adequately controlled by using methods such as:

1. Total enclosure of the process
2. Partial enclosure and extraction equipment
3. General ventilation
4. Using systems of work and handling procedures which minimise the chances of spills, leaks and other escape of hazardous materials

Personal protective equipment may be provided as an interim measure but should not be regarded as a long-term solution.

USING CONTROLS

The Regulations require employees to make proper use of control measures and to report defects but the employer must take all reasonable steps to ensure that they do so.

MAINTENANCE, EXAMINATION AND TESTING OF CONTROL MEASURES

The Regulations place specific duties on employers to ensure that controls are kept in efficient working order and good repair. Engineering controls and respiratory protective equipment have to be examined and, where appropriate, tested at suitable intervals, with set periods laid down for local exhaust ventilation equipment. The employer must keep records of all such examinations and tests for at least five years.

MONITORING EXPOSURE

Employees' exposure to hazardous substances should be monitored:

1. Where there could be serious risks to health if control measures were to fail or deteriorate,
2. If the employer cannot be sure that exposure limits are not being exceeded,
3. Where the employer cannot be sure that particular control measures are working properly.

Record of any exposure monitoring carried out should be kept for at least 40 years if it relates to an identifiable individual and for at least 5 years in all other cases.

HEALTH SURVEILLANCE

Health surveillance is required:

1. Where an employee is engaged in one of the processes listed in Schedule 5 of the COSHH Regulations and is likely to receive significant exposure to the substance involved,
2. Where employees are exposed to a substance linked to a particular disease or adverse health effect and there is a reasonable likelihood under the conditions of the work of that disease or effect occurring and it is possible to detect the disease or adverse health effect.

Health surveillance can involve examinations by a doctor or trained nurse, but trained supervisors could, for example, make simple checks or employees could be asked to complete questionnaires to try and identify any health issues. Regulations require health surveillance records be kept for at least 40 years.

RECORDING AND REVIEWING THE ASSESSMENT

There is no specific statutory requirement to record the assessment but unless the assessment is so simple that it can easily be recalled or explained at any time consideration should be given to putting it in writing. This manual contains two methods of recording assessments. The COSHH assessment slip system is intended to minimise the administrative burden for low risk activities while the full assessment recording system should be used where the assessment cannot be readily repeated or the activity is not regarded as low risk.

The assessment should be reviewed at least once every 5 years and whenever there is reason to believe that it is no longer valid or where there has been a significant change in the work.

INFORMATION, INSTRUCTION AND TRAINING

Employees must receive sufficient information, instruction and training for them to know:

- the risks created by exposure to substances,
- the precautions they should take

The information provided should include details of:

- control measures, their purpose and how to use them,
- how to use personal protective equipment and clothing provided,
- results of any exposure monitoring and health surveillance but without disposing personal information,
- emergency procedures.

23/02/2021