Control of Substances

Hazardous to Health

2017
<table>
<thead>
<tr>
<th><strong>Document title</strong></th>
<th>Control of Substances Hazardous to Health Policy 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document author and department</strong></td>
<td><strong>Responsible person and department</strong></td>
</tr>
<tr>
<td>David Wright</td>
<td>Adrian Parry</td>
</tr>
<tr>
<td>Health &amp; Safety Manager</td>
<td>Chair of University Health &amp; Safety Committee</td>
</tr>
<tr>
<td>Human Resources</td>
<td></td>
</tr>
<tr>
<td><strong>Approving body</strong></td>
<td><strong>Date of approval</strong></td>
</tr>
<tr>
<td>University Health &amp; Safety Committee</td>
<td>8th March 2017</td>
</tr>
<tr>
<td></td>
<td>Minute 16.18.05</td>
</tr>
<tr>
<td><strong>Review date</strong></td>
<td><strong>Edition no</strong></td>
</tr>
<tr>
<td>3 yearly or earlier if required</td>
<td>2</td>
</tr>
<tr>
<td><strong>EITHER</strong></td>
<td><strong>OR</strong></td>
</tr>
<tr>
<td>For public access online (internet)?</td>
<td>Tick as appropriate</td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>For public access on request copy to be mailed</strong></td>
<td><strong>Password protected</strong></td>
</tr>
<tr>
<td>Tick as appropriate</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>
Contents

Summary 4
Introduction 5
Legislation 5
Responsibility 6
Arrangements for Managing Health and Safety 6
Control measures 7
Information, Instruction, Training and Supervision 8
Record Keeping 8
Equality and Diversity 8
Further Information 9
Summary

Purpose of Policy
This policy is designed to ensure the safe use, storage, transport, handling and disposal of substances classified under the *Control of Substances Hazardous to Health Regulations 2002 as amended (COSHH)*, setting out the standards for the management of their use. This policy is intended to ensure that the University is compliant with current legislation and sets out procedures on how to achieve safe environments for University staff, students, contractors and visitors.

Who is this Policy for?
This policy is intended for all University staff, students, visitors and contractors who, whilst on University owned and controlled property, use substances classified under COSHH or frequent areas where such substances are in use.

How does the University ensure the Policy is implemented?
All Departments are responsible for the implementation of control measures and procedures identified in COSHH assessments.

The Health and Safety Office monitors the implementation of control measures and procedures identified in COSHH assessments by periodically carrying out audits of procedures, risk assessments, accident and incident data, as well as feedback from staff and students are utilised to ensure continual improvement.

The Health and Safety Office will maintain an overview of the impact of the Policy and submit regular reports to the University’ Health and Safety Committee and the Governors’ Human Resources Committee.

This Policy and associated procedures and documentation are subject to internal audit.

Who can you contact for enquiries about this Policy?
Any questions about this Policy should be directed to the Health & Safety Office.
Introduction

Work involving the use of all substances hazardous to health must be safe, so far as is reasonably practicable. The Control of Substances Hazardous to Health Regulations 2002 (COSHH) requires employers to make arrangements to control the exposure of their employees to substances that may affect their health. Exposure must be eliminated or, where this is not reasonably practicable, adequately controlled.

Substances hazardous to health are generally those which are classified as being very toxic, toxic, harmful, irritant, corrosive, sensitising, carcinogenic, mutagenic or toxic to reproduction (teratogenic). Gases which act as simple asphyxiants are also covered by the Regulations. For information on controlling microbiological hazards go to Microbiological Safety.

Under the regulations, substances hazardous to health include preparations and mixtures, and inhalable dusts, e.g. drain cleaners which contain sodium hydroxide (caustic soda).

COSHH does not cover:
- flammable and explosive substances
- lead and lead salts (Contact Health & Safety Office)
- asbestos
- radioactive substances which are only harmful by nature of their radioactivity.

These substances are subject to separate pieces of legislation and University policies and procedures. Information on controlling these substances can be found by following the above links.

Legislation

The Health and Safety at Work Act 1974 (HASWA):
The University is required under section 2 of the Health and Safety at Work Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare of employees whilst at work. This legislation includes a general duty of care to protect our students. These requirements are applicable to all work situations, including provision of a working environment that is safe and without risk to health.

The Management of Health and Safety at Work Regulations 1999 (MHSWR)
Requires the University to make suitable and sufficient assessment of the risks to the health and safety of employees whilst they are at work and to ensure the health and safety of third parties (i.e. students, visitors and contractors) arising out of, or in connection with University activity.

Control of Substances Hazardous to Health Regulations 2002 (COSHH): Require the University to carry out a suitable and sufficient assessment of the risks with work
involving exposure to hazardous substances. Where necessary the University should ensure that exposure of staff, students, visitors and contractors to substances hazardous to health is either eliminated or, where this is not reasonably practicable, adequately controlled.

**Workplace (Health, Safety and Welfare) Regulations 1992:** These regulations are intended to protect the health and safety of everyone in the workplace, and ensure that adequate welfare facilities are provided for people at work.

**Personal Protective Equipment at Work Regulations 1992 (PPE):** Requires the University to provide suitable personal protective equipment (PPE) to staff, students, contractors and visitors who may be exposed to risks to their health or safety whilst on University owned or controlled premises; except in circumstances where such risk has been adequately controlled by other means which are equally or more effective.

**The Equality Act 2010 (EA):** Requires the University to ensure that people with ‘protected characteristics’ are not discriminated against in the workplace.

However certain protected characteristics e.g. young people or new and expectant mothers, may be restricted or prevented under the **Management of Health and Safety at Work Regulations 1999.**

**The Data Protection Act 1998:**
The Data Protection Act controls how personal information is used by organisations, businesses or the government. It must be made clear how, when and with whom any personal information collected will be shared. If any personal data is collected, refer to the University Data Protection webpage for guidance.

### Responsibility
Areas of responsibility are defined in the University Health and Safety Policy: Organisation and Arrangements. Non-compliance may lead to disciplinary procedures.

### Arrangements for Managing Health and Safety
The University of Portsmouth will take reasonable steps to ensure that exposures to substances hazardous to health by employees or students are eliminated or controlled to as low is reasonably practicable.

The University undertakes to eliminate or control exposure by using safer substitutions where possible or engineering means where reasonably practicable.

Where exposure cannot be adequately controlled by engineering or procedural means, appropriate personal protective equipment (PPE) will be provided.
All relevant employees and students will be provided with comprehensive information, instruction and training on the safe use and extent of their potential exposure to substances hazardous to health and instruction in the control and preventative measures. Contact the Health and Safety Office for further information.

Contractors will follow the Estates Health, Safety and Environmental Guidelines for Contractors to ensure they are appropriately briefed, protected and supervised in relation to the substances hazardous to health at the University.

COSHH assessments will identify all persons at risk; this will include staff, students, contractors and visitors and adequate control measures to be implemented.

Prior to substances being introduced into the workplace, a COSHH assessment must be undertaken by a competent person to assess the effects on health. The COSHH assessment may include consideration of Safety Data Sheets (SDS – previously Material Safety Data Sheets) provided by the Manufacturer, however, a SDS will not act as a COSHH assessment.

Where employee health surveillance is identified as being necessary, from pre-employment screening or the COSHH assessment, this will be undertaken by the Occupational Health Service.

**Control measures**

Poorly maintained, adjusted or inadequate control measures can result in inadvertent exposure to substances hazardous to health, therefore systems must be in place for prompt repair and for the provision of temporary replacement controls (e.g. PPE).

Old or unused substances should be segregated with a view to disposal as hazardous waste. Only minimum quantities of essential materials should be held.

The following steps can be taken to minimise the risk:

a) ensure hazard information is up to date
b) ensure assessments are suitable and sufficient and fully reassessed:
   I. when process changes are made, e.g. scaling up a reaction
   II. following an accident or incident,
   III. following the introduction of new legislation or new engineering controls
c) ensure employees and students are trained in the nature of the hazards and use of control measures
d) ensure controls are properly maintained and their effectiveness monitored
e) ensure that suitable and sufficient PPE is available, used, maintained and stored correctly
f) ensure all relevant documentation is comprehensive and comprehensible
g) encourage employees and students to report faults and problems

Information, Instruction, Training and Supervision
The University of Portsmouth will give sufficient information, instruction, training and supervision, as described in the University’s Health and Safety Policy – Organisation, to ensure full understanding of the hazards to health posed by substances and the importance of the control measures provided. Information will also be given to others who may be affected, such as contractors, temporary staff and visitors.

Record Keeping
The Health and Safety Office at the University of Portsmouth administers a computer based record system of data gathered during workplace inspections and audits.

Personal information supplied to the University of Portsmouth is protected by the Data Protection Act 1998. The University of Portsmouth will not disclose personal information without consent unless the University is under a legal obligation to do so.

Each University Department (or equivalent) is required to keep up to date records of the use of hazardous substances. Under the provisions of COSHH, departmental records are required to be kept of the following:

- Inventory of hazardous substances
- Assessment of risks of exposure (COSHH assessment).
- Control measures provided
- Methods of use of control measures and defect/fault reporting.
- Examination, testing and repairing of control measures, with records being kept for a minimum of five years
- Background exposure monitoring, or control proving records, should be kept for five years. If an individual can be identified then it becomes 40 years.
- Records of training given to employees

Individual health records are kept by the University in line with the University’s Retention Schedule.

Equality and Diversity
The University’s Equality Analysis Impact procedure was used in the development of this Policy and is available on request.

This Policy is subject to review to ensure it is used appropriately and that it meets with the University’s commitment to equality and diversity.
Further Information
University of Portsmouth

Technical Guidance Note BH02: Dealing with biological hazards from blood, tissues and secretions in non laboratory situations.

Technical Guidance Note CHM01: Health Effects of Metals

Technical Guidance Note CHM02: Risk Phrases

Technical Guidance Note CHM03: Safety Phrases

Technical Guidance Note CHM04: Control of Printer and Photocopier Hazards

Technical Guidance Note CHM05: Basic Procedures for Handling, Storing and Using Chemicals

Technical Guidance Note CHM06: Compressed Gases Relative Vapour Density

Technical Guidance Note CHM09: Globally Harmonised System and Classification, Labelling and Packaging of Substances and Mixtures Regulations

Technical Guidance Note CHM10: Hazard Statements

Technical Guidance Note CHM011: Precautionary Statements

External Sources

Health and Safety Executive
Approved Code of Practice for Control of Substances Hazardous to Health: L5

Health and Safety Executive
COSHH Essentials: Provides basic advice on what to do to control exposure to hazardous substances in the workplace. See website: http://www.hse.gov.uk/coshh/essentials/index.htm

Health and Safety Executive
EH40/2005 Workplace Exposure Limits

Health and Safety Executive
Personal Protective Equipment (PPE) at Work; a Brief Guide: INDG174
Health and Safety Executive  
*Respiratory Protective Equipment (RPE) at Work; a Practical Guide: HSG53*

Health and Safety Executive website provides an overview of the CLP Regulations:  

The Classification, Labelling and Packaging of Chemicals Regulation 2015 (CLP): As a downstream user of chemicals the University is required to classify, label and package chemical substances and mixtures used, in line with the CLP Regulation on classification, labelling and packaging (CLP).

Chemicals Hazard Information and Packaging for Supply Regulations 2009 (CHIP): Replaced by the CLP Regulations on 1st June 2015; however chemicals and mixtures packaged, labelled and stored prior to this date are covered under the CHIP Regulations until 1st June 2017.