



RISK MANAGEMENT GUIDE

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH REGULATIONS 2002 (COSHH)

What is COSHH?

The regulations are aimed at preventing injury and damage to health from exposure to hazardous substances that are stored, used, or occur, in connection with your work activities.

What is a hazardous substance?

For the purposes of COSHH (Regulation 2), substances hazardous to health include:

- substances listed in Part 1 of the Approved Supply List of the Chemicals (Hazard Information and Packaging for Supply) Regulations 1994 (known as CHIP 2 Regulations), substances or preparations (which may be natural or artificial and in a solid, liquid, gaseous, or vapour form) categorised as very toxic, toxic, harmful, corrosive or irritant
- substances with maximum exposure limits (listed in Health & Safety Executive publication EH40 Occupational Exposure Limits) or occupational exposure standards
- biological agents, i.e. micro-organism, cell culture or human endoparasite (including those which have been genetically modified) which may cause harm to health
- dusts of any kind at a concentration in air equal to or greater than 10 mg/m³ total inhalable dust 8hr Time Weighted Average (TWA) or 4 mg/m³ respirable dust 8hr TWA
- any other substance causing comparable hazards to health.

Suppliers' and manufacturers' safety data sheets and container labels are an initial source of information. Other hazardous substances are listed in HSE Guidance Notes and Statutory Approved Lists. Separate, specific Regulations deal with asbestos, lead and ionizing radiation.

The routes through which a substance can cause ill health or harm are inhalation, absorption through the skin, ingestion by swallowing, or by acting directly on the body at point of contact or by injection.

Some illnesses caused by exposure may not appear until a long time after the first exposure and the susceptibility of individual people can vary significantly. Different working environments can also increase the toxic response to a substance.

What are the Main Requirements?

The primary requirement is for all employers to assess the risk of health damage to their employees or others from substances stored, used, produced or encountered in the course of their business. Following this assessment, there may then be a further need to provide or implement some or all of the following:

- The introduction of appropriate additional measures to control the risk.
- Systems to maintain, examine and test control measures.
- Procedures to monitor employee exposure.
- Arrangements for health surveillance.
- Information, instruction and training for employees on the risks and precautions to be taken.

(The duties to assess, and to provide and maintain etc. control measures, extend to the self-employed.)

The assessments should be reviewed regularly (at least every five years) but especially when there are grounds to suspect it is no longer valid, e.g. change of process or production methods, introduction of new materials, evidence of ill health, queries arising from Local Exhaust Ventilation (LEV) or other monitoring activities.

Further information on the carrying out of COSHH Risk Assessments is available from **MORE TH>N BUSINESS** in the form of a further Risk Management Guideline entitled COSHH Regulations – Risk Assessments

What control measures should be used?

COSHH requires every employer to prevent exposure of employees to hazardous substances (Regulation 7). Only where this is not reasonably practical may the risk be controlled by measures – other than the provision of Personal Protective Equipment (PPE) – including for example:

- elimination, or substitution by a safer substance
- modifying the process or changing the method of work
- reducing the number of employees exposed or their exposure periods
- totally enclosing processes and handling systems
- providing adequate general or Local Exhaust Ventilation (LEV)
- procedures for safe storage and disposal of materials
- adequate washing, changing and clothing storage facilities
- effective waste management

A special hierarchy of controls is required where it is not reasonably practicable to prevent exposure to Carcinogens by the use of alternative substances or processes.

Specific provisions are also applicable for minimum safety standards for work involving Biological Agents.

Use of Control Measures

Employers must take all reasonable steps to ensure that control measures provided are properly used or applied.

Employees must make full and proper use of control measures that are provided.

Additionally, any defect in what is provided must be reported to their employer (see Employee Information, Instruction and Training below).

Procedures should be established by the employer, to ensure control measures are effective. They should include

- visual checks at appropriate intervals
- prompt remedial action where necessary

Employees should be monitored to ensure control measures, including Personal Protective Equipment are being used correctly, particularly:

- using the correct control measures for the materials plant and processes
- wearing the Personal Protective Equipment in the proper manner
- storing the Personal Protective Equipment correctly when not in use
- removing equipment before eating, drinking or smoking
- practicing a high standard of personal hygiene, and making full use of the welfare facilities provided
- reporting promptly any defects in any control equipment

What maintenance arrangements are necessary for control measures etc?

Control measures, and respiratory protective equipment, must be properly maintained and used, with examination and test at suitable intervals.

With some exceptions, Local Exhaust Ventilation must be examined and tested at least every 14 months by a competent person.

Suitable records of examinations and tests, and of any repairs found necessary/carried out must be kept available for inspection for at least five years.

When is monitoring of exposure at the workplace necessary?

Where employees are exposed to hazardous substances and the exposure must be controlled, their exposure must be monitored by a suitable procedure, for example by routine air sampling.

In specified cases the frequency of monitoring is stipulated in Schedule 5 to the Regulations.

Records of monitoring must be kept for at least five years. Where the monitoring record is of the personal exposure of identifiable employees, the retention period is extended to 40 years.

When should Employee Health Surveillance be provided?

Where assessed as being appropriate for the protection of employees' health, the employer must arrange for suitable health surveillance to be put in place (Regulation 11).

Schedule 6 to the regulations details those substances and processes for which health surveillance is appropriate (unless exposure is insignificant).

In addition to these specified processes and substances, it may also be appropriate where the exposure to hazardous substances is such that an adverse health effect may occur.

The objectives of health surveillance, where employees are exposed to hazardous substances in their work activities are:

- the protection of the health of individual employees by early detection of health changes attributable to the substances
- to assist in the evaluation of control measures in place
- the collection, analysis, maintenance and use of data for the detection and evaluation of hazards to health
- to assess the immunity of employees to biological agents

The results of any health surveillance programme should lead to action, which will be of benefit to the health of employees.

An employer must keep surveillance records for at least 40 years after the last date of entry.

What Employee Information, Instruction and Training should be provided?

Employees and others in the workplace who may be exposed to hazardous substances must be provided with suitable and sufficient information, instruction and training (Regulation 12) to allow them to know:

- the nature and degree of risks to health created by exposure
- the precautions and procedures to be taken
- the control measures in place (including Personal Protective Equipment)
- when and how to use them
- the monitoring procedures in place including the role of health surveillance and access to the results
- any emergency procedures which may be appropriate.

Where can I obtain further information?

The following are available from the Health and Safety Executive (HSE), the list is not exhaustive.

L5: Control of Substances Hazardous to Health Regulations 2002: ACOP and Guidance

L55: Preventing Asthma at Work

L67: Control of Vinyl Chloride at Work: ACOP

L86: Control of Substances Hazardous to Health in Fumigation Operations: ACOP

H40: Workplace Exposure Limits

HSG37: An introduction to local exhaust ventilation

HSG53: The selection, use and maintenance of respiratory protective equipment

HSG54: The maintenance, examination and testing of local exhaust ventilation

HSG61: Health surveillance at work

HSG97: A Step-by-step Guide to COSHH Assessment

HSG110: Seven Steps to Successful Substitution of Hazardous Substances

HSG188: Health Risk Management: A Guide to Working with Solvents

HSG193: COSHH Essentials: Easy Steps to Control Chemicals

HSG205: Assessing and Managing Risks at Work from Skin Exposure to Chemical Agents: Guidance for Employers and Health and Safety Specialists

INDG95: Respiratory Sensitisers and COSHH: Breathe Freely: An Employers' Leaflet on Preventing Occupational Asthma

INDG233: Preventing Dermatitis at Work: Advice for Employers and Employees

INDG273: Working Safely with Solvents: A Guide to Safe Working Practices

The HSE have a specific web-page dedicated to COSHH which is located at <http://www.hse.gov.uk/coshh/index.htm>

HSE priced and free publications are available by mail order from HSE Books, PO Box 1999, Sudbury, Suffolk CO10 2WA Tel: 01787 881165 Fax: 01787 313995. Details may also be obtained from the HSE Books home page on the World Wide Web at <http://www.hsebooks.com/Books/>

The HSE home page on the World Wide Web is <http://www.hse.gov.uk/index.htm>

Their enquiry service is also available at HSE Info-line Tel: 0845 3450055.

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