



## Middleton Cheney Parish Council

<b>Category:</b> Procedure	<b>Status:</b> Adopted
<b>Responsible:</b> Clerk/RFO	<b>Adoption minute ref:</b> 23/242
<b>Applicable to:</b> Finance & Policy Committee	<b>Adoption date:</b> 18/09/2023
<b>Version:</b> 1.0	<b>Next review:</b>

# Control of Substances Hazardous to Health Procedure

## 1.1 Purpose

To ensure full compliance with all relevant statutory instruments and to provide a system for the safe use, handling, storage, and transportation for substances which may be hazardous to health.

## 1.2 Scope

All Middleton Cheney Parish Council Councillors and staff.

## 1.3 Definitions

COSHH: Control of Substances Hazardous to Health Regulations 2002.

Hazard: Anything that has the potential to cause harm including ill-health, injury, or environmental loss.

Risk: This considers both the likelihood that harm will occur and the severity, should harm occur.

Substance: Any vapour, fume, mist, dust, liquid, gas or solid

COSHH Risk Assessment: This is the process of assessing what could cause harm in your workplace and what the risk is. The risk assessment then considers whether enough precautions have been taken to minimise the risk, or whether more needs to be done to prevent harm. A COSHH Risk assessment should specifically consider the use, handling, storage, and transportation of substances within the workplace.

MSDS (Material Safety Data Sheet): This should be supplied with any purchased substance. The MSDS should provide information regarding the contents of the product and the risks associated with the product.

Risk Control Measure: The purpose of a risk control measure is to minimise the risk so far as is reasonably practicable.

PPE: Personal Protective Equipment

RPE: Respiratory Protective Equipment

WEL (Workplace Exposure Limit): This is an Occupational Exposure Limit that has been set under the COSHH Regulations. The WEL is the concentration of a hazardous substance in the air. The concentration is averaged over two time periods; long-term (8 hours) and short-term (15 minutes). In the workplace the WEL of any hazardous substance must not be exceeded. For a comprehensive list of all established WELs refer to the HSE document EH40.

#### **1.4 Method**

Risk Assessments

It is a requirement of the Control of Substances Hazardous to Health Regulations that a suitable and sufficient risk assessment is completed for a substance that may be hazardous to the health of employees if exposed whilst at work.

A COSHH risk assessment must therefore be completed for any new or existing substances that may be hazardous to the health of employees or others. It is the responsibility of the Clerk to ensure that COSHH risk assessments are completed for all substances identified so far as is reasonably practicable.

#### **1.5 COSHH Risk Assessors**

The Clerk may designate responsible people as COSHH Risk Assessors to undertake the COSHH risk assessment. However, they must ensure that the designated risk assessors are provided with adequate time, resources, and training to ensure that they have the knowledge and experience to undertake suitable and sufficient COSHH risk assessments.

#### **1.6 Approval Process**

Prior to the use, storage, handling, or transportation of any new substance, the designated COSHH Assessor should be notified. The COSHH Assessor will require an up-to-date MSDS for the substance so that a COSHH Assessment can be completed prior to arrival of any new substance.

Where the MSDS indicates that the substance is Toxic, Corrosive, Sensitising, Carcinogenic, Mutagenic, Teratogenic or Explosive, a copy of the MSDS for the substance must be sent to the Clerk for approval for its use. The substance must not be brought onto Council property until it has the approval of the Clerk.

#### **1.7 The Risk Assessment Process**

When any new or existing tasks, activities or processes have been identified as involving the use, handling, storage, or transportation of substances that may be hazardous to health, the designated risk assessor should be notified so that a COSHH risk assessment can be completed. The COSHH risk assessment should be completed prior to any new task, activity or process commencing that involves the use, handling, storage, or transportation of substances that may be hazardous to health.

The risk assessment process should consist of the following stages:

- Hazard Identification
- Effects of Hazardous Substances
- Assessment of Risk of Harm occurring
- Persons at risk
- Review of Current and Additional Control Measures
- Control Measures
- Record of risk assessment findings
- Monitoring
- Review

#### Hazard Identification

For any identified new or existing task, activity, or process, the designated COSHH risk assessor will need to establish what hazardous substances employees and others may be exposed to. In addition, where the substance used is substituted for an alternative, a new COSHH risk assessment will be required.

Hazardous substances may include:

Substances used directly in work activities e.g., adhesives, paints, cleaning products  
 Substances generated during work activities e.g., welding or soldering fumes, waste material etc. Naturally occurring substances e.g., tea dust, coffee bean dust. Biological agents such as bacteria and microorganisms e.g., legionella.

#### Effects of Hazardous Substances

Having identified substances that may be hazardous to health, the effects of hazardous substances will need to be considered. Examples of the effects of hazardous substances include:

- Irritation to skin, eyes or the respiratory system.
- Corrosive burns to the skin and eyes.
- Asthma as a result of developing an allergy to substances at work.
- Losing consciousness as a result of being overcome by toxic fumes.
- Cancer, which may appear long after exposure to the substance.
- Infection from biological agents.

Once the hazardous substances have been identified, a material safety data sheet (MSDS) must be obtained from the supplier. A copy of the MSDS must be obtained prior to any new substance being purchased and delivered to site. The MSDS for the substance will provide information regarding the potential hazardous effects of the substance. This information is located in Section 15 of the MSDS where it will list Risk Phrases for the substance.

Where the substance is one that is a product of an internal process, information regarding its hazardous properties may be found from the HSE publications EH40/2005 Workplace exposure Limits and Approved Supply List. Information approved for the classification and labelling of substances and preparations dangerous for supply.

#### Assess the Risk of Harm Occurring

Having identified the potential harm that a substance could cause to someone's health, the likely risk also of this occurring also needs to be addressed. To make an assessment of the risk, the following questions should be asked.

How much of the substance is used?

What quantities of the substance will be used? If the substance is produced as part of a process, how much of the substance may be produced? When considering the quantities, this should cover all types of activities, including daily activities, maintenance activities and potential spills. This information should be recorded on the COSHH Risk Assessment form.

How could people be exposed to the substance?

This should consider how people will come into contact with the substance. To accurately assess this, the properties of the substance and how it is used need to be considered. Depending on the substance and its use this will determine the likelihood of exposure. Will users come into direct contact with the substance or is the substance enclosed for example. The COSHH assessor therefore needs to consider:

Use of Substances

- How is the substance being used?
- Will the user be directly handling the substance?
- Will the user be likely to come into direct contact with the substance?
- Will anyone else come into direct contact with the substance?
- If the substance is produced as part of a process will anyone come into direct contact?

When considering the use of the substance, all activities must be considered, including daily activities through to non-routine and one-off activities. In addition, emergency situations such as spills or leaks should be considered. Furthermore, possible contamination should also be considered. For example, a hazardous substance may get into the mouth from contaminated hands during eating or smoking. This information should be recorded on the COSHH Risk Assessment form.

Properties of Substance

When considering the type of substances that people may be exposed to, the COSHH Assessor also needs to consider whether the activity or process give rise to:

- Dusts
- Vapours
- Mists
- Gases

How will individuals be exposed?

By considering both the use of the substance and its properties, the COSHH assessor can consider how individuals may be exposed to the substance and how harm may occur. The COSHH assessor must therefore consider whether exposure will occur through:

- Direct skin or eye contact
- Indirect skin or eye contact e.g. through contamination of clothing
- Absorption through the skin
- Ingestion
- Inhalation

This information should be recorded on the COSHH Risk Assessment form.

Persons at Risk

The designated risk assessor should consider all possible people that may be at risk of being exposed to any hazards associated with the task, process or activity. The most immediate

people at risk will be employees and contractors directly involved with the task, process, or activity or in the immediate area where the substance is being used or produced.

Other people that may also be at risk include young workers, trainees, pregnant workers, cleaners, contractors, maintenance workers and visitors. These therefore need to be considered as part of the risk assessment. This information should be recorded on the COSHH Assessment request form.

#### Current Control Measures

An assessment should be made to evaluate what control measures are currently in place to minimise any risks associated with substances used or produced as part of a task, process, or activity. When assessing current controls, it is important that the COSHH Risk Assessors consider whether the current controls are effective and work properly. In addition, it is important to ensure that everyone affected has a clear understanding of the control measures in place. This information should be recorded on the COSHH Risk Assessment form.

#### Risk Control Measures

Where it is identified that control measures are needed or that current control measures are not sufficient, suitable control measures will need to be considered. With regard to suitable control measures, specific regulations, ACOPs and guidance should be referred to.

When the COSHH risk assessor is assessing existing or new control measures, adequate regard should be given to the Hierarchy of Risk Control. The hierarchy of control must be followed so far as is reasonably practicable, as this is a requirement of the Control of Substances Hazardous to Health Regulations 2002.

The hierarchy of Risk Control specifies that to minimise risk so far as is reasonably practicable, the following principles should be followed in this order:

- Remove the risk i.e., through elimination hence e.g., change the process of activity so the hazardous substance is not needed or produced.
- Reduce the risk i.e., through substitution of the substance for a safer, less hazardous alternative or use it in a safer form e.g., pellets instead of powder.
- Change the work method or pattern.
- Reduce or limit the time of exposure.
- Implement engineering controls e.g., Local Exhaust Ventilation (LEV), Dilution Ventilation.
- Ensure good housekeeping.
- Ensure safe systems of work.
- Provide adequate training and supervision.
- Provide suitable Personal Protective Equipment.

Upon gathering the above information, this information should be recorded on the COSHH Risk Assessment Form (Appendix A). A copy of the COSHH Risk Assessment Form should be sent to the Safety Advisor with the appropriate attached MSDS.

A COSHH Information Sheet will be completed and the appropriate COSHH Assessor will be notified when the Information Sheet is complete and available on the COSHH database for the area it is to be used in.

#### Record of Risk Assessment Findings

A record, in the form of the completed COSHH Risk Assessment Form, showing its significant findings must be kept and updated when the recommendations have been completed. Copies of the COSHH risk assessment and Information Sheet must be easily accessible to all employees that may be affected.

All COSHH risk assessments must be kept for at least five years for record purposes from the date that they are no longer required.

#### Monitoring

The completed risk assessment should be monitored to ensure that all recommendations are fully implemented. This is the responsibility of both the COSHH Risk Assessor and the Clerk to ensure that recommendations are implemented. In addition, once the control measures have been implemented, it is important to monitor that they are effective in controlling the risks to as low as is reasonably practicable. Where it is shown that the controls are not adequate the risk assessment should be reviewed.

#### Review

The risk assessment should be reviewed on a periodic basis. The frequency that the risk assessment will need to be reviewed will depend on the nature of the risk.

In addition, substances identified as toxic, corrosive, sensitising, carcinogenic, mutagenic or teratogenic should be reviewed at least every twelve months. As part of the review, where it is reasonably practicable to do so, safer alternatives would be sought to replace such hazardous substances. In addition, the COSHH risk assessment should also be reviewed under the following circumstances:

- When any significant change occurs to the process, task or activity.
- Introduction of any new substances that may be hazardous.
- New available information regarding hazardous substances.
- New available technology to minimise the risks.
- New requirements implemented by new legislation.
- Changes in the workforce e.g., introduction of trainees or pregnant worker.
- Accident, incident or ill-health indicates that the control measures are not adequately controlling the risks.
- An audit or inspection indicates that the control measures are not controlling the risks.

The Clerk and designated COSHH Risk Assessor should be notified should any of these circumstances occur so that the COSHH risk assessment can be reviewed.

### **1.8 Personal Protective Equipment**

Where the COSHH assessment identifies a requirement for Personal Protective Equipment (PPE), the selected PPE must be selected so that it is suitable for the purpose to adequately control exposure to hazardous substances. The PPE must also be compatible to both the user and the environment that it is to be worn in. Furthermore, if it is to be worn with other PPE, all items must be compatible with one another. All PPE must also comply with the Personal Protective Equipment Regulations 2002. For further information regarding this, refer to MCPC Personal Protective Equipment Procedure.

All selected PPE must fit the user correctly. In the case of RPE, this must also fit correctly so as to ensure a tight seal on the user. When initially selecting any tight fitting RPE, the RPE should be tested on users to ensure that the correct device is being used. This will usually involve a quantitative face fit test to establish whether the face seal is sufficient to protect the user from being exposed to hazardous substances.

All PPE must be properly stored in a clean environment to protect from contamination from hazardous substances. All PPE should be inspected on a regular basis to ensure that it is clean and in good condition. Where the PPE is contaminated or damaged, the PPE should be cleaned, repaired or destroyed.

All users must be trained in the importance of wearing PPE where it is identified as required. They should also be aware of the importance to ensure PPE is kept clean and stored correctly.

### **1.9 Maintenance and Inspection**

All plant, equipment, engineering controls and PPE should be maintained in an efficient state, efficient working order, good repair and in a clean condition. In addition, in accordance with COSHH Regulation 9, all engineering controls implemented will require a thorough examination and testing at suitable intervals. More specifically, in the case of Local Exhaust Ventilation systems (LEV), thorough examination and testing will be required at least every 14 months. Where it is identified that RPE will be required, this will also require thorough examination and testing at suitable intervals.

Records for all maintenance, testing and thorough examinations must be kept. This should also include any defects and repairs. Records should be kept for a minimum of five years.

### **1.10 Training**

All employees will be trained in COSHH Awareness. All designated COSHH risk assessors should be given adequate training to undertake their duties as risk assessors. This will involve completing a COSHH risk assessment training course. In addition, they should shadow an experienced COSHH risk assessor when undertaking their first COSHH risk assessments so as to gain practical knowledge and experience.

### **1.11 Health Surveillance**

A proactive approach to health surveillance, as required under COSHH Regulation 11, will be undertaken. The Clerk will ensure that where appropriate employees undertake a medical prior to commencing work. Where it is identified that their role will may expose them to hazardous substances, the Clerk will make an assessment to ensure that there is no medical reasons that would put them at a higher risk than normal should they be exposed to certain hazardous substances.

Where symptoms related to exposure to certain substances are reported to the Clerk, this will again be fed back to the Parish Council so that the risk assessments can be reviewed to ensure that they are adequately controlling the risks.

The Clerk will keep all medical records for individuals, including any health surveillance related to exposure to certain hazardous substances, for at least forty years.

If an individual is diagnosed by a doctor with Occupational Asthma, the Clerk will notify the Parish Council. In addition, they will notify the HSE, as required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

The Clerk will also assist in advising how to prevent further progression of any symptoms that may be related to exposure to certain hazardous substances.

### **1.12 WEL/Monitoring**

As a requirement of COSHH Regulation 10, where it is identified that a substance has a Workplace Exposure Limit (WEL), if it is likely that the WEL may be exceeded, workplace air monitoring will be undertaken. This will be to establish exposure levels for all individuals that may be potentially exposed. If the WEL is exceeded, the COSHH assessment must be reviewed to ensure that the control measures are adequately controlling exposure. In addition, further control measures may be required to ensure that the WEL is not exceeded and is as low as is reasonably practicable. Furthermore, if the substance is identified as toxic, mutagenic, teratogenic, carcinogenic, or a sensitiser, the exposure must be reduced to as low as is practicable.

Records

MCPC COSHH Assessment (Appendix 1)

References

MCPC COSHH Policy

MCPC Personal Protective Equipment Procedure

#### **Document History**

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Changes</b>	<b>Status</b>	<b>Minute ref</b>
1.0	Alan Youel	07-08-2023		Draft	