**FQM LIMITED**



**XXX-OP-007**

**CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH**

1. **PURPOSE**

The purpose of this procedure is to provide a method and practical guidance for the control of substances hazardous to health at all [COMPANY NAME] sites. This includes compliance with the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended).

1. **SCOPE**

This procedure describes the process by which:

The requirement to assess and control the risk to health from substances used in the workplace is carried out.

[COMPANY NAME] complies with the general requirements to assess the risk of activities in relation to the Control of Substances Hazardous to Health and related Regulations.

COSHH Regulations do not apply to:

* Asbestos.
* Lead.
* Radioactive substance.

However, the Regulations do apply to biological agents such as Legionella which can be found in heating, ventilation, air conditioning or water systems.

1. **RESPONSIBILITIES**

* **Site management** will be responsible for:
  + The implementation of this procedure by means of instructions and procedures.
  + Appointing a suitable person to be COSHH co-ordinator, usually the HSE Manager/Advisor, and will ensure that this person is provided with adequate time, resources and training to perform this function. This person must possess sufficient knowledge, skill and experience to perform the work effectively.
* **HSE Manager/HS Advisors** are responsible for:
* Ensuring that this procedure is maintained and communicated to all relevant [COMPANY NAME] personnel.
* Developing specific and fit for purpose methods based upon the guidance in this procedure and maintain these at all [COMPANY NAME] sites.
* Ensuring by means of induction, signage and information, that all employees are aware of COSHH methods at all [COMPANY NAME] sites.
* Understanding COSHH measures.
* Ensuring adequate information, instruction and training are provided to work personnel about COSHH and how to reduce the risks.
* Maintaining records as per required by this procedure.
  + In conjunction with line management, to compile and maintain an inventory of substances hazardous to health held on site.
  + To assemble health and safety information on substances used on site and make available to all persons.
* Ensure a system is in place for the screening of new substances prior to arrival
* Ensure that no prohibited substances are used or stored within the site.
* Assist line management in identifying and listing all activities which require to be assessed as part of a continuous process
* **Operations Managers** are responsible for:
* Ensuring on a daily basis, persons are not exposed to substances which are harmful to health as a result of work activities by means of line management and supervision.
  + Ensuring this procedure is implemented and adhered to at their sites.
  + Appointing competent persons to perform the duties required by this procedure.
  + Ensuring that supervisory staff under their control are familiar with their duties described in this procedure.
* **Site Foremen/Chargehands** are responsible for:
* Ensuring all personnel on site under their supervision are following correct procedures and instructions.
* Ensuring all personnel on site under their supervision are operating in line with COSHH guidelines, information and training.
* **All employees** are required to:
* Comply with correct working procedures and instructions.
* Follow and work to COSHH guidelines, information and training.

1. **DEFINITIONS**

**Hazard**

A hazard is anything with the potential to cause harm.

**Risk**

A risk is the likelihood that a hazard will cause a specified harm to someone or something. It is based upon; Hazard Effect x Probability = Risk.

**Exposure**

Exposure to a substance is uptake into the body either by:

* Inhalation.
* Contact.
* Injection.
* Ingestion.

**Substances hazardous to health**

COSHH covers substances that are hazardous to health. Substances can take many forms and include:

* Chemicals.
* Products containing chemicals.
* Fumes.
* Dusts.
* Vapour.
* Mists.
* Gases and asphyxiating gases.
* Biological agents (germs).
* Germs that cause disease such as leptospirosis or legionnaire’s disease.

1. **COSHH ASSESSMENTS**
   1. **Substance Inventory**

The COSHH co-ordinator is responsible for maintaining the site substance inventory. The inventory should include:

* Substance name.
* Supplier.
* Physical form.
* Storage point.
* Use.
* User.
* Cross reference to appropriate COSHH assessment numbers.

The primary information source for the inventory will be the substance label. Other sources of information include guidance from the HSE, previous experience of use and text books/data bases. Account must be taken of substances, which occur as a bi-product of the process such as dusts and fumes, as well as proprietary substances.

* 1. **Selection Procedure**

For all substances hazardous to health brought into the workplace the first priority is to prevent exposure. This can be achieved via substitution with a safer substance. It is the responsibility of the person proposing the use of the substance to ensure.

* That all necessary information on the substance is available.
* The use of any available safer alternatives has been considered.

The proposer must complete a "COSHH - new substance assessment sheet" Special provisions are made for carcinogenic (cancer causing) substances under COSHH. In this case complete prevention by the use of alternative substances or processes is necessary.

1. **PREVENTION OR CONTROL OF EXPOSURE**
   1. **Control Measures**

A fundamental principle of COSHH is that prevention or control of exposure should be by means other than the use of personal protective equipment. In general, when considering preventive or control measures the following hierarchy should be followed (from most to least acceptable).

* Elimination of the substance or procedure.
* Substitution of hazardous substance or procedures with those which are less so.
* Totally enclosed process and handling system.
* Partial enclosure with LEV.
* Sufficient general ventilation.
* Administrative controls to limit the number of people exposed or length of exposure.
* Provision of personal protective equipment.

Exposure may have to be controlled by using more than one control measure. Personal protective equipment may be suitable for emergencies, for breakdown situation and as a short-term measure until a more permanent solution is put in place.

* 1. **Maintenance and Inspection of Control Measures**

Control measures must be subject to regular inspection to ensure they operate adequately, such things that are to be looked at include:

* Weekly visual checks.
* Preventive maintenance routines.
* Local Exhaust Ventilation -thoroughly tested and examined every 14 months.

Operational Procedures should be reviewed annually to ensure they remain effective engineering controls.

* 1. **Exposure Monitoring**

Exposure monitoring may need to be carried out for a number of reasons including:

* As part of an assessment.
* To ensure the adequacy of control.
* Where failure of control measures could lead to serious health effects.
* When necessary to show compliance with Workplace Exposure Limits.

If exposure monitoring is required, the COSHH co-ordinator will discuss this with the site Operations Manager. Exposure monitoring if and when required will normally be arranged by the HSE Manager through an outside contractor who will also be responsible for maintaining the necessary records.

* 1. **Health Surveillance**

COSHH assessors will highlight on assessment forms where specialist assistance is required with regard to health surveillance. Such assessments will be forwarded to the HSE manager who will decide whether the health surveillance will be carried out by an outside contractor.

* 1. **Information, Instruction and Training**

All persons who may be exposed to substances hazardous to health must receive sufficient information, instruction and training. This may include the following:

* Information on the results of COSHH assessments highlighting the potential risk and required precautions.
* Instructions or information given as part of job orientation, task instructions, toolbox talks and safety meetings.
* Training in the use, storage and maintenance of PPE.
* Instructions given by performing authorities as part of Integrated Safe System of Work
* Emergency procedures
* Access to individual’s personal records from exposure monitoring or health surveillance.
  1. **Competence**

Completion of the following levels of training together with on-the-job experience are considered indicative of competency:

**All personnel** - general awareness from induction training, toolbox talks, use of COSHH training material and IOSH training course.

**Assessors** - Approved COSHH assessors course.

1. **SUBSTANCES NOT COVERED BY COSHH**
   1. **General**

A number of substances are excluded from the COSHH Regulations because, either they are covered by other more specific Regulations (such as asbestos) or their principal hazard is not to health (e.g. they are flammable or explosive).

* 1. **Asphyxiants**

The principal risk from asphyxiants occurs during entry to confined spaces when oxygen may have been displaced from the space to a level below that which sustains breathing. Reference should be made to HS-OP-002 for details of confined space entry.

* 1. **Lead**

The control of lead at work is covered by a separate set of Regulations however the basic principles are identical to those of the COSHH Regulations. These include:

* Assessment.
* Control of Exposure.
* Information Instruction and Training.
* Maintenance of control measures.
* Monitoring.
* Health surveillance.

1. **COSHH ASSESSMENT PROCEDURE**
   1. **Introduction**

COSHH requires that all work activities which involve, or potentially involve, exposure to substances hazardous to health must be assessed. In their guidance document 'A Step by Step Guide to COSHH Assessment' the HSE place the emphasis on taking a task-based approach to assessment and in all but the simplest cases it is recommended that an activity based approach will be more effective and easier to manage than a substance by substance strategy. This Procedure takes the task-based approach and the following is given as a suitable approach to compiling the necessary information.

The COSHH Co-ordinator with assistance from line management should compile an initial task inventory of all activities involving the use of hazardous substances. This activity-based approach gives much more scope for grouping assessments into broadly consistent categories and therefore can prevent unnecessary or wasted effort by avoiding repetition.

Assessments can therefore be applied to whole processes, specific sections of a process or unique and routine activities. What is actually included in any one assessment depends on what is manageable, what is relevant to the exercise and what are the possibilities for exposure.

If there are no substances hazardous to health involved in a process then no assessment is required under COSHH. Remember that some exposures may not be part of a particular task or activity but may be generated on site or arise as a result of emissions from processes, exhausts, vents, spillages and leaks. The presence of micro-organisms such as Legionella bacteria should also be considered. Other established methods of assessing risks such as the Integrated Safe System of Work or formal task risk assessment as required by the Management of Health and Safety at Work Regulations can also be utilised to highlight activities requiring a more detailed or comprehensive COSHH assessment.

* 1. **Assessment Process**

**Duties**

COSHH requires employers not to engage in activities which involve the use of substances hazardous to health unless they have first carried out an assessment. The duty of assessment applies to all operations where substances hazardous to health are used, processed, given off or produced. However, what that duty will involve, in terms of detail, effort or expertise will vary greatly from one situation to another.

**Assessments**

The COSHH Co-ordinator shall establish a programme for carrying out COSHH assessments which shall take account of:

* Activities in which hazardous substances are used.
* New activities/substances to be introduced to the site.
* Review of existing COSHH assessments.

The primary responsibility for instigating COSHH assessments is the Health and Safety Manager/Advisor’s who will have received training as a COSHH assessor. Evaluating the risks to health involves combining the answers to the following questions:

* What is the potential of a substance for causing harm?
* What is the chance of exposure occurring?
* How much are people exposed to, how often and for how long?

Pulling together all the information will enable the Assessors to draw conclusions about the risks to health, the suitability of available control measures, the need for specialist assistance and issues which need to be drawn to the attention of the employer. The assessment documentation is designed to assist Assessors in this process by providing a structured approach and directing Assessors thinking. The process of COSHH assessment described in this Procedure is a method for systematically examining activities, evaluating the risks associated with substances, as they are used at work, and determining the measures necessary to protect the health of all those affected by the work.

All substances assessed will be recorded in the [COMPANY NAME] COSHH database.

**Assessment Review**

The Regulations state that assessments shall be reviewed regularly and immediately if:

* There is reason to suspect that the assessment is no longer valid: or
* There has been a significant change in the work to which the assessment relates.

All COSHH assessments shall include a date for review; it is recommended that this be carried out on an annual basis. Review does not necessarily mean complete reassessment; generally the review will be a desktop exercise by the relevant assessor if it is clear that the risks are the same then there is no need to modify the assessment.

1. **REVIEW**

This procedure will be reviewed regularly, at a minimum on a yearly basis, at the annual management meeting. Additional review maybe required due to changes in legislation, operations, technology, personnel etc.