



# **POLICY FOR COSHH (CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH) POLICY**

Written By: Nursery Manager

Date approved by Directors:

Signature:

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# **COSHH (CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH) POLICY**

## **1. Introduction**

1.1. The Control of Substances Hazardous to Health (COSHH) Regulations 2002 provides the legal framework to protect people against health risks from hazardous substances at work. The regulations require employers to adequately assess the risk to health arising from work activities, to control exposure to hazardous substances and to protect both staff and others, who may be exposed, including the environment.

## **2. Scope**

2.1. The term hazardous substance describes a wide range of substances with the potential to cause harm if they are inhaled, ingested, injected or absorbed through the skin or released into the environment. Common substances such as cleaning materials, herbicides and pesticides can be hazardous and/or harmful to the environment.

2.2. Hazardous substances occur in the following forms from packaged items or work processes:

- Substances or a mixture of substances classified as dangerous which carry warnings such as Toxic, Very Toxic, Harmful, Corrosive, Irritant, Sensitising or Carcinogenic.
- Substances with Workplace Exposure Limits (WEL). Workplace Exposure Limits have replaced the Maximum Exposure Limit (MEL) and Occupational Exposure Standard (OES). Substances with WEL's are listed in EH40.
- Biological agents (bacteria, viruses and other micro-organisms).
- Any kind of dust in a specific concentration.
- Any other substances which create a risk to health, e.g. dusts, liquids, vapours, gases, mist, fibres, solids or smoke.

2.3. These substances usually indicate their basic hazard group by their warning label of a black symbol against an orange background.

2.4. Some substances are excluded from the COSHH regulations but are covered by their own specific regulations. These include:

- Radioactive materials.
- Asbestos.
- Lead and lead products.
- Material hazardous due to flammability only. These fall under Dangerous Substances and Explosive Atmosphere Regulations (DSEAR).
- Substances used for medical treatment.

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### **3. Director Responsibility**

3.1. The Chair of Directors has the overall responsibility for the implementation of this policy under the COSHH regulations. The Director in turn delegates responsibility to the Nursery Manager and Site Manager.

### **4. COSHH Officer Responsibility**

4.1. The COSHH Officer is Site Manager Mr Chris Baker. He works with the cleaners who deal with substances under his direction.

4.2. The COSHH Officer will make adequate arrangements to ensure, so far as is reasonably practicable, that staff follow safe systems of work thus minimising the risk.

4.3. Safe systems of work:

- Establishing the system for complying with the regulation, including individual responsibilities and informing staff of these.
- Identifying the hazardous substances used in the workplace and ascertaining the risks from using these substances.
- Considering whether the substances are definitely needed or whether a safer substance could be used.
- Undertaking risk assessments to account for all working practices in the directorate in which the hazardous exposure may occur.
- Preventing people being exposed to hazardous substances, but where this is not possible, controlling the exposure.
- Restricting the use of hazardous substances to nominated staff.
- Deciding what precautions are needed before starting work with a hazardous substance.
- Sharing the results of COSHH risk assessments and notifying other bodies of actions to be taken.

4.4. Purchasing:

- Ensuring any new product ordered comes with its Material Safety Data Sheet (MSDS) and that a COSHH risk assessment is undertaken before the substance is used.

4.5. Stock Level:

- Ensuring stocks of substances are kept to a minimum, used in date order and within the expiry date.
- Ensuring substances are stored and labelled correctly in accordance with the manufacturer's instructions. Appropriate hazard signs should be provided on all storage areas/cupboards where a risk has been identified.
- Ensuring that aerosols are not left on window sills or in direct sunlight.
- Ensuring correct disposal of substances e.g. hazardous waste, recycling of containers.

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#### 4.6. Personal Protective Equipment and Environmental Protective Equipment:

- Providing Personal Protective Equipment (PPE) to prevent exposure if required. All equipment must be appropriate to the substance and must meet EURO standards. Staff must be trained to clean the equipment efficiently and effectively, if required.
- Making sure control measures, e.g. PPE are used correctly and properly maintained, disposed of safely and that safety procedures are followed.
- Providing Environmental Protective Equipment (EPE) if required, e.g. drip trays, spill kits.
- Ensuring correct disposal of contents of EPE.

#### 4.7. Training:

- Ensuring all staff, including temporary staff are aware of the procedures, receive information, instruction and training as required, so that they are aware of the risk to health created by their exposure to hazardous substances and the precautions that need to be taken to ensure safe storage and use.

#### 4.8. Maintenance:

- Ensuring any local exhaust ventilation system (LEV) is thoroughly examined at least once every 14 months and dated and signed records kept.

#### 4.9. Health surveillance:

- Monitoring exposure to hazardous substance (if required).
- Reporting any work related disease, e.g. dermatitis, occupational asthma on the accident reporting system.

## 5. Staff Responsibility

### 5.1. All staff are required to follow a safe system of work. This includes:

- Using hazardous substances in accordance with the manufacturer's instructions and COSHH risk assessments.
- Familiarising themselves with the relevant COSHH risk assessments, data sheets and relevant policies.
- Attending instruction and training in the use of/contact with substances.
- Reporting any health symptoms arising from their work material to their line manager, e.g. skin irritation, breathing problems.
- Using all control measures (i.e. ventilation, PPE) provided in the manner shown in their training or safe systems of work. Following the recommended dilution rate and not decanting if possible.
- Wearing/storing appropriate PPE if provided, as designed, including carrying out maintenance and cleaning as required.
- Reporting any defects in PPE provided to their manager.
- Assisting in the compilation of a risk assessment (where required).
- Making themselves available for any health or medical surveillance deemed necessary in relation to the substances.
- Ensuring good standards of hygiene.

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## 6. Health and Safety Officer Responsibility

- 6.1. The Health and Safety officer is the Nursery Manager. She is responsible for:
- Liaising with COSHH Officer
  - Reporting any work related disease to the Health and Safety Executive (HSE).
  - Arranging health surveillance as required.
  - Keeping all health surveillance records for a minimum of 40 years from the date of last entry.
  - Allowing the employee to have access to their health records.

## 7. COSHH Risk Assessments

- 7.1. A COSHH assessment is an assessment of risk and control measures to staff and others affected by the substance. The hazard associated with the substance and the way it is being used will decide the level of risk that staff could face. The Material Safety Data Sheet (MSDS) will give information about substance hazards. It is not a replacement for the risk assessment. Risk assessments must combine the assessor's own professional knowledge and methods of use of the substances in their area. Wherever possible the manufacturers 'Hazard' should be used for this purpose in conjunction with the MSDS.
- 7.2. For each substance, it is necessary to think about the risks involved. If it is believed that there is no risk, or only a very small one, then no further action is required. If unsure, please contact your Health and Safety Officer or COSHH Officer.
- 7.3. If a COSHH risk assessment is required, this must be undertaken by a Head of Department. The COSHH risk assessment must not just be based on the level of risk associated with the substance, but must reflect how the substance is used, e.g. the same product diluted is less dangerous than it is when concentrate.

## 8. Control Measures

- 8.1. An important part of the process of COSHH risk assessment is the identification of effective control measures. All control measures must perform as intended and continue to prevent or adequately control the exposure to substances hazardous to health. If controls are found to be inadequate and therefore could result in reduced efficiency, effectiveness or levels of protection for staff, the following is the preferred hierarchy of control measures which should be considered:
- Elimination. Does the substance have to be used? If not, it should be disposed of correctly. If necessary seek advice from the supplier.
  - Substitution. Could another (less hazardous) substance be used instead?
  - Reduction. Can reduced amounts be used?
  - Isolation/Enclosure e.g. redesigning the working environment to contain the substance.
  - LEV/General Ventilation e.g. fume cupboard or just opening the window and doors to cause natural ventilation.
  - Safe Systems of Work. Staff to be aware of procedures for using substances safely and protecting themselves in normal and emergency circumstances. Safe systems of work may specify the need to limit the length of exposure or just good standards of

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hygiene housekeeping e.g. staff to be responsible for putting away substance after use.

- Information/Instruction. Training must be given to staff and others (e.g. contractors, visitors) on the substances, the risks, the methods of control, any PPE or EPE required and emergency measures.
- Supervision. Staff to be supervised in their work activities to ensure that they are following safe systems of work and are applying the training received.
- PPE. This is provided as a last resort because it only protects the individual wearing it. It must be suitable for the task and conditions. It must be regularly inspected with records kept. If PPE is provided it must be worn in the manner it is designed for. A list of PPE provided is required on the risk assessment.

## **9. Working Arrangements**

9.1. If the Nursery Manager or COSHH Officer are advised that staff are pregnant or have a medical condition whereby they may be affected by hazardous substances, advice on using substances must be sought and included in the risk assessment, as the mother or unborn child may be at risk.

## **10. Emergencies**

10.1. In the event of an emergency involving a hazardous substance, the staff member present must take immediate steps to:

- Make the area safe.
- Minimise the effect of the event.
- Inform any staff who may be affected.
- Restrict access to the affected area to essential personnel only and provide with the necessary PPE until the situation returns to normal.

10.2. Details of emergency procedures, including a spills procedure, must be documented, communicated to staff and displayed in the workplace. In addition, it should be tested, reviewed and revised periodically (as detailed in the monitoring and review section). A log of emergency situations and near misses should be kept.

## **11. Purchasing**

11.1. All requisitions for purchasing must be checked before processing to identify if the product requested has COSHH implications. If the product has COSHH implications, the person responsible for ordering materials must then ensure that a MSDS is obtained prior to ordering (not for re-orders). Suppliers of materials are legally bound to supply a MSDS with any new purchase and to inform the School of changes to existing substances. Supplies of COSHH substances should be kept to a minimum and audited on an annual basis to ensure they are still the most effective but environmentally friendly product for the job. If a definitive list of substances exists for a particular service, e.g. Caretaking and Cleaning, only these products must be used.

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## **12. Disposal/Environmental Issues**

- 12.1. Substances no longer used must be disposed of in accordance with manufacturer's instructions.
- 12.2. Hazardous waste must be sent to companies that are licensed to carry the waste (a copy of the carrier's licence must be obtained before the first pick up and held on file). In addition, they must be licensed to handle the waste (a copy of the waste licence must be obtained before the first pick up and held on file). Waste disposal paperwork received must be held on file and be easily accessible. Paperwork must display the European Waste Catalogue (EWC) six digit code and details of the site. Waste transfer notes for hazardous waste must be held for three years.

## **13. Monitoring and Review**

- 13.1. It is the responsibility of the Nursery Manager to ensure that risk assessments are undertaken and the assessments are kept up to date and reviewed:
- At least annually.
  - When there has been a change in work procedure.
  - If the substance is used for a different task.
  - If a substance has changed, e.g. new MSDS received.
  - Upon HSE direction.
  - Following any adverse incident involving the substance or task.