



Document Title: Control of Substances Hazardous to Health Policy

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1. Introduction

This policy sets out the responsibility of Royal Holloway Students' Union (RHSU) to meet the requirements of the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended). It requires that the exposure of staff, students and other persons who may be affected by the work of RHSU to substances hazardous to health is either prevented or, where that is not reasonably practicable, adequately controlled.

2. What is Control of Substances Hazardous to Health (COSHH)?

COSHH covers a number of different hazards. Hazards which have specifically been identified as likely to be encountered at RHSU are:

- Chemicals
- Products containing chemicals
- Fumes
- Vapours
- Mists
- Gas and Asphyxiating gases
- Biological agents (germs)
- Nanotechnology
- Germs that cause disease

If an item has any of the hazard symbols on it then it is classed as a hazardous substance and should be treated with care, ensuring adherence to the manufacturer's instructions.

3. Employer Responsibilities

To achieve compliance with the Regulations, day-to-day responsibility is devolved to Heads of Departments and respective line managers. It is their responsibility to ensure the safe use of potentially hazardous substances with relevant staff and students, ensuring that sufficient training is provided to equip them to undertake their designated tasks with minimum exposure to risk.

Heads of Departments and respective line manager must incorporate the following good practice principles into their departmental procedures:

- i. design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- ii. substance substitution – prevent exposure to a hazardous substance by substituting it with another substance which presents a lesser risk or use another process which does not create a hazardous form of the substance.
- iii. take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures
- iv. control exposure by measures that are proportionate to the health risk
- v. choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
- vi. where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- vii. check and review regularly all elements of control measures for their continuing effectiveness
- viii. inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks
- ix. ensure that the introduction of control measures does not increase the overall risk to health and safety.

4. Employee Responsibilities

All employees have a duty to take reasonable steps to ensure that they do not place themselves or others at risk of harm. They are also expected to co-operate fully in complying with any procedures that may be introduced as a measure to protect the safety and well-being of our staff and visitors.

It is the responsibility of all employees to handle hazardous chemicals correctly and if unaware of the correct handling procedure to ask their line manager.

5. COSHH Procedures

To meet the detailed requirements of the COSHH Regulations, compliance with the following requirements is necessary in respect of existing substances, before new substances are introduced, or changes to existing substances take place:

- i. Before any new substance is introduced at RHSU, a risk assessment, (using the template RHSU COSHH Assessment Form) and the product safety data sheet will be conducted. Covering all aspects of the use of the substance from delivery to final disposal, the assessment will be conducted by a line manager in the relevant department.
- ii. Only where the risk assessment identifies that it is 'safe' to do so may the substance be introduced into use. 'Safe' in this context means within the bounds of the information, instruction and training, equipment, including air extraction systems, general ventilation, personal protective equipment and health surveillance, that it is reasonably practicable to provide.
- iii. Where the risk assessment identifies that equipment or facilities are required in addition to those currently provided, then a substance will not be introduced into service until the requirements identified to be necessary by the COSHH assessment have been implemented and it can, therefore, be used safely.
- iv. Departments will hold a comprehensive list of every substance falling within the requirements of the COSHH Regulations. A copy of its completed COSHH assessment sheet, safety data sheet and other relevant information, including a record of the information will be retained for each substance
- v. Completed COSHH assessments and accompanying product safety data sheets will be held in the immediate vicinity in which substances are in use. This will ensure they are available for reference purposes including use, storage, first aid and such other means as may be determined to be appropriate. Electronic versions will be kept centrally in the shared H&S folder.
- vi. Line managers are responsible for the disposal of hazardous waste (chemical and biological) in accordance with the requirements of environmental legislation, holding at all times a current list of all substances awaiting disposal. Each disposal container shall clearly display the contents and quantity held therein. Disposal will be the responsibility of, and co-ordinated by, a member of the relevant department and undertaken at periods not exceeding twelve calendar months or less, if required under specific legislation.
- vii. To meet the above objectives, regular reviews of all potentially hazardous substances in use shall be conducted. Those presenting risks in which exposure is likely to present a danger to health shall either be taken out of service, substituted by a substance less hazardous and where neither is possible, action will be taken to further control the risk.

6. COSHH Risk Assessment

Trained COSHH Assessors should follow the below procedure when assessing risks from substances which their staff may come into contact with on a daily basis:

- i. Identify the hazard (for example when considering the use of a new substance; reviewing a previous incident; or consideration of a process that might emit hazardous substances such

as dust, vapour etc.). It is recommended that Line managers walk around their area to consider the daily tasks undertaken and any hazards that may stem from these.

- ii. Consider the risks associated with the substance.
- iii. Note how risks can be reduced.
- iv. If a need for a control is identified a control must be created and implemented. For example, if new safety equipment (PPE) or new health and safety or medical training is required for staff.

All assessments are subject to change and should be reviewed on at least an annual basis (or earlier if required) to ensure that they remain up to date and relevant.

Each department which uses chemicals should have an up to date chemical safety sheet for each chemical. This sheet provides data on storage, handling and what to do in an emergency situation. A safety data sheet is not a risk assessment, but it should be consulted when creating the risk assessment.

Chemicals bought onto site by third party staff i.e. contractors or cleaners are not subject to a RHSU assessment as these chemicals are not provided by RHSU and must not be used by RHSU staff or students.

All COSHH Risk Assessments must be recorded centrally within the H&S shared folder to ensure that it can be accessed by all relevant individuals.

7. Training

All line managers responsible for conducting COSHH assessments must be assessor trained. This is provided by College Health & Safety. Training records will be held centrally by HR but individuals and their departments will be responsible for ensuring that their training is kept up to date.

All staff that use substances which are noted as being a risk should be trained on how to use the substances correctly. This includes the correct storage and maintenance where applicable. Staff should be made aware of any controls in place i.e. use of PPE and what to do in the event of a spill or other emergency.

8. Monitoring

The implementation of this Policy will be continuously monitored at departmental level.

Departmental Heads will be expected to carry out routine on the spot inspections, recording any areas where corrective action may be necessary and reporting any issues to the H&S Committee.