

Control of Substances Hazardous to Health Policy

Synopsis


The University of Aberdeen is committed to providing a safe and healthy working environment. All reasonable steps will be taken to ensure that all exposure of personnel to substances hazardous to health is prevented or controlled as far as is reasonably practicable and to within statutory limits. COSHH assessments are a vital tool in preventing cases of ill health and injury. It is therefore the policy of the University of Aberdeen that all substances hazardous to health will be COSHH assessed.

COSHH assessments are not to be confused with Risk Assessments, a COSHH assessment is an assessment of the hazards presented by a specific substance.

Approval

Approved by: SMT

Date: February 2024

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Revision Record

Issue	Date	Reason for Review
Draft 4	Oct 2023	New document for consultation
Draft 5	Dec 2023	Clarified requirement for checking SDS and included an explanation about separate vs integrated COSHH and risk assessments
Rev 1	Feb 2024	Issued for Use

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1.0 Purpose of the Policy

The purpose of this policy is to describe the University of Aberdeen’s policy on the Control of Substances Hazardous to Health (COSHH) and the arrangements for producing COSHH assessments.

2.0 Scope of Policy

This document applies to all substances hazardous to health being used or stored on any University of Aberdeen premises.

The Control of Substances Hazardous to Health Regulations 2002 do not include the following substances as they have their own specific regulations:

- Lead
- Asbestos
- Radioactive Substances


3.0 Definitions

Term	Definition
COSHH	Control of Substances Hazardous to Health
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
TRO	Technical Resource Officer
LSC	Local Safety Coordinator
SMT	Senior Management Team
Hazardous Substance	A hazardous substance is any substance that has one or more inherent hazardous property. This includes flammability, explosiveness, toxicity, the ability to oxidise, carcinogenic, as well as biological agents.

4.0 Legislative Requirements

The Management of Health and Safety at Work Act 1999 places a duty on employers to undertake risk assessments to identify potential hazards to employee health and safety and anyone who may be affected by their work.

The Health and Safety at Work Act 1974 sets out the framework for managing workplace health and safety in the UK. The act defines the general duties of everyone from employers and employees, to managers and maintainers of work premises for maintaining health and safety within the workplace.

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The Personal Protective Equipment Regulations 2022 places a duty on every employer in the UK to ensure that if PPE is used in the workplace by someone who may be exposed to a risk to their health and safety, then the PPE provided by the employer must be suitable.

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) require employers to adequately control exposure to hazardous substances in the workplace that cause ill health.

5.0 Responsibilities

University Court

The University Court is ultimately responsible for overseeing health and safety matters at the University. As such they should seek assurance that appropriate risk control measures have been implemented.

Senior Management Team


The Senior Management Team (SMT) has delegated authority from the University Court and as such, should seek reassurance that appropriate risk control measures are in place, are being implemented and that those with risk management and assessment responsibilities are trained and competent.

Heads of Schools / Directorates

- Ensure that local COSHH management meets the requirements outlined in this policy
- Ensure that those responsible for carrying out COSHH assessments understand their responsibilities and are suitably trained to do so
- Ensure arrangements are in place for COSHH assessments to be carried out before hazardous substances are brought on site
- Ensure that, if necessary, that any COSHH assessments that identify a need for health surveillance are acted upon
- Ensure that adequate resources are made available to allow for suitable and sufficient COSHH assessments to be carried out

Line Managers / Supervisors

- Ensure that COSHH assessments are conducted and that their findings are communicated to those working with the hazardous substance, or those who are likely to be affected by the use of hazardous substances
- Ensure that COSHH assessments are carried out by a competent person
- Ensure that COSHH assessments are regularly reviewed
- Ensure that if a need for PPE is identified that it is made available and is used
- Arrange referrals to Occupational Health if health surveillance is required
- Identify posts which might require health surveillance so it can begin as soon as the person starts in their role

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COSHH Assessors

- Refer to Safety Data Sheets to ascertain if substance require a COSHH assessment
- Be aware of the COSHH management requirements
- Create COSHH assessments
- Update COSHH assessments if / when SDS's are amended

Note: SDS sheets are not expected to be checked without cause, instead they would be checked for amendments at reasonable intervals e.g. during the review of the COSHH assessment, when the product is restocked, if the manufacturer makes you aware of changes etc.

Health and Safety Team

- Provide advice and guidance
- Provide any assistance required with creating COSHH assessments

All Staff

- Assist with carrying out COSHH assessments where necessary
- Be aware of the risk mitigations specified in COSHH assessments
- Always use PPE when required
- Always use mechanical control measures (e.g. fume hoods) to protect themselves and others where possible


6.0 Chemical Storage

Chemicals must be stored in accordance with Guidance Note *HS-GN-022 – Chemical Hazards & Storage Guidance*. The key principles of this guidance is that chemicals must be suitably stored to reduce the risk to the health of staff and students, but also to protect assets from the hazards associated with the improper storage of chemicals.

7.0 What Should be Assessed

A COSHH assessment is required for any work which involves, or may involve, exposure to a hazardous substance (including substances listed in EH40, Workplace Exposure Limits). The assessment must ensure that appropriate control measures have been implemented if elimination or substitution of the substance is not possible.

There will be some scenarios where chemical use will present a very low hazard e.g. cleaners using cleaning chemicals as they were intended, in these cases it would be reasonable to include a general statement in the risk assessment about the use of all cleaning chemicals. However, in areas where chemicals are being mixed, heated, amended, their state is being changed then it would be necessary to carry out an assessment of each of the chemicals being used in more detail.

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8.0 Hierarchy of Controls

When deciding what controls are required, the hierarchy of control should be followed, with preference given to the controls which will have the greatest positive impact and are the most reliable:

1. Elimination
2. Substitution
3. Engineering Controls
4. Safe Systems of Work
5. Personal Protective Equipment

Elimination

Elimination as a control measure means to remove it entirely, this removes all risks that the specific chemical presents. A hazardous substance could be eliminated by totally banning its use or by restricting its use in the workplace. This can be done by preventing its purchase so it does not make its way onto site or by safely disposing of any that is already on site. Elimination is the most effective way to reduce a hazard and is best done when designing a work task or project, this way you could plan to purchase pre-diluted chemicals to eliminate the need to purchase them neat and then have to dilute them on site. However, it is understood that for research and teaching at the University this is not always possible.


Substitution

After elimination, substitution is the next most effective means of control. Substitution means to replace one hazardous substance with another with less severe or fewer hazards. For example, many laboratories use a substance such as SybrSafe instead of Ethidium Bromide as its hazards are less severe.

You may not always be able to substitute one substance for another, but you could choose to use the chemical in a different state. For example, using damp cleaning wipes rather than a spray bottle of cleaning solution would reduce the volume of hazardous particles in the air.

Engineering Controls

Engineering controls are mechanical systems that prevent the hazardous substances coming into contact with the user or others such as fume hoods, microbiological safety cabinets, etc. Users are required to carry out pre-use visual checks and must report any defects to their academic or line manager immediately. More information can be found in *HS-GN-030 - Local Exhaust Ventilation Guidance*.

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Safe Systems of Work

Safe Systems of Work (sometimes referred to as administrative controls) are work practices designed to reduce the duration, frequency, and severity of exposure. They are always used in conjunction with other controls. These systems could include:

- Chemical safety policies and standard operating procedures
- Rules prohibiting certain behaviours in the workplace
- Restricting access to parts of the workplace
- Decontamination procedures
- Housekeeping
- Warning signs
- Occupational Health monitoring
- Alarms
- Training

PPE

PPE should be considered as a backup method for other, more robust controls. The type and use of PPE must be carefully assessed and must be used and maintained in accordance with manufacturers guidance. You must remember that PPE only protects the user and consideration should be given to others who may be working nearby.


9.0 Communication

The COSHH assessment process should be carried out in consultation with the staff / students / others who will be involved in the work activity. On completion, the COSHH assessment the findings must be shared with others who will be involved in the task and any others who will be affected by the task. COSHH assessments should remain readily accessible for staff to consult with as needed.

10.0 Review

COSHH assessments are to be reviewed periodically. As a minimum they should be reviewed every 3 years or sooner if:

- There has been an accident, near miss or case of ill health relevant to the COSHH assessment, the accident investigator may request the assessment is reviewed
- The existing assessment is no longer accurate (e.g. the process is being done in a different location)
- There has been a change to the work environment, activity or process

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11.0 Chemical Waste Disposal

Waste is considered 'hazardous' under environmental legislation when it contains substances or has properties that might make it harmful to human health or the environment. This does not necessarily mean it is an immediate risk to human health, although some waste can be.

Before disposal, users are required to correctly handle, separate, use appropriate storage containers and waste and have an authorised business registered to collect the hazardous waste. The COSHH assessment and safety data sheet should be consulted to ensure waste is being disposed via the correct waste disposal route.

Individual Schools / Directorates are required to identify and make available suitable chemical waste storage areas for waste awaiting uplift. Some schools / directorates may have arrangements with neighbouring ones to collate their waste due to space restraints or in order to minimise uplift costs. The University Waste Manager will arrange chemical waste uplifts when they are required.

12.0 Health Surveillance

The University contracts an Occupational Health company who will carry out health surveillance checks when required. Health surveillance would be required when a disease or condition with a known cause is linked to a work activity (e.g. working with respiratory sensitisers). Surveillance can help us ensure that the right measures and controls are in place to protect people. Line Managers should contact HR who will arrange a referral for the individual to the Occupational Health Contractor for the necessary surveillance checks. Line managers are also encouraged to identify which posts might require health surveillance so it can begin as soon as the person starts in their role.


13.0 Training

The university will provide information, training and instruction for employees who work with substances hazardous to health. This includes cleaning and maintenance staff who may use hazardous substances in their role. Records of any training must be retained.

Users must also understand the outcome of COSHH assessments and what it means for them. They must know:

- What the hazards and risks are
- About any workplace exposure limit
- The result of any monitoring of exposure
- The general results of any monitoring
- The results of any health surveillance
- What to do in the event of an accident or emergency e.g. spill or exposure

When a contractor comes on site they need to know of any risks relevant to them are and how the university is controlling them. The university must also know if they are bringing hazardous

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substances onto our premises, and how they will prevent harm to university staff and students. The host of the contractor is responsible for finding out about this information and communicating any relevant information to those who may be affected.

14.0 References

Document Number	Document Name
UA011 / HS-PO-031	Biosafety Policy
HS-GN-017	Respiratory Protective Equipment Guidance
HS-GN-022	Chemical Hazards & Storage Guidance
HS-GN-030	Local Exhaust Ventilation Guidance
HS-GN-031	Occupational Health Guidance
HS-SF-003	COSHH Assessment Form
Online	Health & Safety Executive Online Health Surveillance Guidance
Online	EH40 Workplace Exposure Limits