



Control of Substances Hazardous to Health, COSHH, Policy

SETTING THE POLICY STATUS

1. This is the Council's corporate policy on the control of substances hazardous to health, COSHH. The policy sets minimum standards that **all** stakeholders must meet. It is based on the Council's 'Risk Assessment Policy', which is the basis for all health and safety compliance. COSHH assessments support the general risk assessments carried out by managers by assessing the risks of hazardous substances, if these have been highlighted as a hazard in the general assessment.
2. All corporate H&S policy and guidance documents are available on:
 - [iDerby](#)
 - the [Schools' Information Portal](#), SIP.
3. You can also get copies from the Health and Safety Team, HST. Managers with employees who can't access iDerby or the SIP must set up alternative arrangements to make sure they get appropriate H&S information. This might be by printing information off and circulating it or handing out copies at team meetings.

Directorate arrangements

4. Directorates are responsible for:
 - formally adopting this policy
 - devising arrangements that meet corporate COSHH standards
 - producing written evidence outlining their practical arrangements for implementing the corporate policy. These will include:
 - details of the people with specific responsibilities
 - implementation action plans, with timescales
 - performance measures and the ways of monitoring them.
5. Directorates can adopt higher standards and adapt the guidance that supports this policy to meet their operational needs and arrangements.

Approval

6. Directorate arrangements and guidance must go through the Council's normal consultation process. They must be approved by the:
 - directorate management team
 - directorate Joint Consultative Committee, JCC.

DEMONSTRATING COMMITMENT

7. The Council is committed to protecting its employees' health, safety and well-being. We believe that the best way to do this is through a proactive health and safety management system based on risk assessment. This includes ensuring employees are not put at risk, so far as is reasonably practicable, by any substances or chemicals used or produced as a result of work activities.
8. The Council is committed to meeting its legal obligation to do 'suitable and sufficient' COSHH assessments for **all** work activities involving hazardous substances.

ASSURING MINIMUM STANDARDS

9. We will base our approach to controlling the risks from substances on the requirements of current law and the latest guidance from the Health and Safety Executive, HSE. Eight principles of good practice have been introduced for controlling the risks from hazardous substances. They are...
 - Processes and activities must be designed and operated to minimise the release and spread of hazardous substances.
 - All relevant exposure routes, such as inhalation, skin absorption and ingestion, must be taken into account when developing control measures.
 - Exposure must be controlled by measures that are proportionate to the health risk.
 - The most effective and reliable control measures, which minimise the escape and spread of hazardous substances, must be chosen.
 - Where adequate control of exposure cannot be achieved by other means, suitable personal protective equipment, PPE, should be provided. However, this must be done in combination with other control measures.
 - Control measures must be checked and reviewed regularly for their continuing effectiveness.
 - All employees must be informed and trained on the hazards and risks from the substances they use at work, and the control measures developed to reduce those risks.
 - The use of control measures must not increase the overall risk to health and safety.
10. The adequate control of exposure to hazardous substances will require us to:
 - apply the eight principles of good practice
 - make sure that Workplace Exposure Limits are not exceeded for any substances that have them
 - make sure that exposure to substances that can cause occupational asthma, cancer or damage to genes is reduced as low as is reasonably practicable.

11. The eight principles must be taken into account when developing directorate arrangements for COSHH. These can be broken down into five main elements:

- identifying hazardous substances and exposures
- assessing and evaluating the risks from them
- developing and implementing control measures to reduce the risks
- providing information and training
- monitoring and checking the effectiveness of the control measures.

Identification

- Identify **all** hazardous substances linked to work activities and the hazards that these substances have. Substances will include those generated by work activities and biological agents, such as micro-organisms.
- Determine how much of each substance is used or produced by the work activity. This includes dusts and fumes generated, from example, soldering and welding.
- Identify who might be exposed to the substances and how that could happen. This will include how often the substances are used.
- Encourage employees and their health and safety representatives to be actively involved in COSHH assessments and risk management.

Assessment and evaluation

- Evaluate the risk of harm occurring taking into account:
 - the chance of exposure happening
 - how often exposure is likely to happen
 - what level of exposure could happen and for how long.
- Involve the Occupational Health Service. This is to make sure any health risks are adequately covered, and health surveillance programmes can be set up when necessary.
- Record the significant findings of COSHH assessments and use them to devise clear written safe working procedures.
- Make sure assessments are reviewed regularly and revised when necessary.

Development and implementation

- Make sure positive action is taken to deal with any risks identified. The aim is to prevent exposure to hazardous substances, if it is reasonably practicable to do so. Actions will include assessing the effectiveness of existing precautions, such as local exhaust ventilation.
- Develop and implement measures to control the exposure, such as general ventilation or containment if appropriate.
- Prepare plans and procedures to deal with accidents, incidents and emergencies, if the assessment highlights that these are necessary.
- Monitor the exposure of employees to hazardous substances, if the assessment highlights that this is necessary.

Information and training

- Provide clear information for employees.
- Provide training, instruction and supervision for employees.

Monitoring

- Monitor preventative and control measures to make sure they're effective, and take urgent steps to improve them if they're not.
12. Guidance on implementing COSHH is given in the 'Control of Substances Hazardous to Health Policy - Managers' Guide'.

SHOWING ACCOUNTABILITY - ROLES, RIGHTS AND RESPONSIBILITIES

13. Policies only work when they make things happen. It helps if everyone's clear about what they need to do...

Directors

14. Directors and their senior management teams are responsible for making sure their department meets the requirements of this policy. This means they must:
- oversee the development and implementation of directorate arrangements and action plans
 - make sure significant issues highlighted by COSHH assessments are used to help shape business planning processes, and resources are prioritised for managing any risks identified by the assessments
 - show their positive and visible commitment to making sure that employees are not exposed to risks from hazardous substances
 - actively check that their managers do COSHH assessments and monitor the results.

Managers

15. Risk assessment is a key management responsibility of equal importance with other business activities. Managers should have the detailed knowledge of their employees, workplaces and activities that is vital for the risk assessment process. Part of this includes preventing potentially harmful exposure to hazardous substances to employees and other people, such as contractors and members of the public.

16. Managers are responsible for:

- doing COSHH assessments for any activities they control that involve the use of hazardous substances
- making sure substances specified for work activities present the least risk to the health of employees and other people
- making sure employees and their health and safety representatives are involved in the risk assessment process
- devising, implementing and reviewing safe working procedures
- monitoring health and safety performance by doing regular workplace inspections, spot checks and audits
- making sure employees use the control measures needed to control or prevent exposure to hazardous substances
- making sure only specified, risk-assessed substances are used in work activities
- setting up systems to make sure control measures are checked and maintained
- identifying their employees' health and safety training needs through COSHH assessment and task monitoring.

Officers who commission or specify work

18. Officers have COSHH assessment duties if they:

- design work for others to do
- specify how a task has to be done, the materials, substances or equipment to be used. This will include any substances generated by work tasks, such as welding fumes
- commission work from contractors.

19. These duties include:

- assessing the risks linked to the use of hazardous substances through their designs, instructions or specifications **before** they're finalised
- adjusting their designs, instructions or specifications after their assessment to eliminate or reduce risks. This will include making sure that any substances specified for work activities present the least risk to the health of employees and other people
- passing their findings, especially details of any residual risks, to the person or contractor doing the work
- working with contractors to develop COSHH assessments and preventative measures for contracted work, if hazardous substances are used. This will be a joint exercise between the specifying officer and the contractor. This is to make sure that only specified, risk-assessed substances are used in work activities.

Employees

20. Employees have a legal right to be consulted about work-related risks and the protective measures in place to deal with them. These include the use of hazardous substances. Employees' knowledge of work tasks is vital to make sure:
- risk and other health and safety assessments, including COSHH, are realistic and complete
 - control and protective measures are practical and effective
 - any problems are identified and dealt with quickly.
21. Employees have responsibilities as well as rights. These include:
- reporting any hazards, risks or unsafe situations they identify at work
 - being co-operative and proactive in all health and safety issues. This includes following safe working procedures and using control measures introduced to reduce their exposure to hazardous substances
 - only using specified, risk-assessed products, and not buying or bringing into work any unauthorised chemicals
 - following any training and instructions given to them
 - reporting any problems or shortcomings in the Council's health and safety arrangements. This includes any concerns they have about COSHH assessment and the use of hazardous substances.

Trade union health and safety representatives, HSRs

22. HSRs have legal rights in the workplace. These include the right to:
- inspect and take copies of any documents linked to health and safety in the workplace, including COSHH assessments
 - be consulted about any planned changes that could affect their members' health and safety
 - monitor and review COSHH assessments, policies and departmental arrangements
 - investigate hazards, accidents and their members' complaints
 - do inspections.

PROGRESS THROUGH PARTNERSHIP

23. The Council recognises that a co-operative partnership approach between **all** stakeholders is essential for effective risk management, including controlling the risks of hazardous substances. Managers have the primary responsibility for getting COSHH assessments done, and managing any identified risks. They **must** work together with employees and their HSRs throughout the COSHH assessment process.

EMPOWERING EMPLOYEES THROUGH TRAINING

24. The Council has a legal duty to provide suitable health and safety training for its employees. This must be:
- adapted to the needs and capabilities of the employees it's aimed at
 - provided during normal working hours. If this isn't possible, then employees must be paid, or given time off in lieu, to attend outside their normal hours
 - 'topped up' by refresher training at reasonable intervals.
25. Suitable training can be provided in a range of ways. Depending on the individual circumstances, this might include on-the-job training with another experienced employee, 'toolbox talks' or team briefing sessions, formal accredited courses, practical workshops, mentoring or coaching schemes.
26. Directorates are responsible for:
- organising suitable COSHH assessment and other related training for their employees. This will include for managers who will be carrying out the assessments, and employees who will be using the hazardous substances. The HST run a short course covering COSHH basics including assessment. See our [health and safety training page](#) for more information.
 - making sure all employees attend appropriate training sessions within reasonable timescales
 - keeping adequate training records.