

Control of Substances Hazardous to Health Arrangement

United Colleges Group and Constituent Colleges

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| Author | John Huckstepp, M.Sc., SFIIRSM, Tech.IOSH |
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## Control of Substances Hazardous to Health Arrangement

## **UNITED COLLEGES GROUP POLICY STATEMENT**

The United Colleges Group, comprising City of Westminster College and the College of North West London, is committed to giving the highest priority to the safety, health and welfare of all employees, learners, contractors and visitors.

The nature of work at the colleges is such that chemicals are used, handled, stored, transported and disposed of by employees, learners and contractors. In some cases, visitors may be exposed to chemicals by virtue of the activity they are performing and the environments they are visiting. In some cases, contractors, learners or visitors could bring substances onto site. Substances include chemicals and biological agents.

Safe use of substances in the UK requires consideration of the following pieces of legislation: The Control of Substances Hazardous to Health Regulations (2002), and its associated Approved Code of Practice, the Classification, Labelling and Packaging Regulation (2008), and the Dangerous Substances and Explosive Atmospheres Regulations 2002 as amended. Good practice also requires consideration of Home Office guidance for chemical security in education.

## **UNITED COLLEGES GROUP RESPONSIBILITIES**

The United Colleges Group is committed to:

* 1. The assessment of risk to health by work involving hazardous substances.
  2. The prevention or control of exposure to hazardous substances.
  3. The establishment, use, maintenance, examination and testing of control measures.
  4. Exposure monitoring to assess the extent of exposure.
  5. Health surveillance for those employees exposed to hazardous substances.
  6. The provision of information, instructions and training.
  7. Providing arrangements for dealing with incidents and emergencies.
  8. Provide protection (other than health surveillance) for other people on the permises.

## **DUTIES OF EMPLOYEES AND OTHERS**

All employees and those using the United Colleges Group facilities have a duty to support the Health and Safety Policy by:

* 1. Participate in assessment, prevention and control processes.
  2. Use, maintenance, examination and testing of control measures.
  3. Participate and support exposure monitoring and health surveillance activities.
  4. Undertake training and read relevant information and instructions prior to working with substances.
  5. Follow emergency procedures and protocols.
  6. Contractors should clearly indicate details of any substances they intend to bring on to site prior to commencing work and must ensure that all substances are safely secured whilst on site, and removed from site on completion of work.

## **ARRANGEMENTS FOR HEALTH AND SAFETY**

United Colleges Group recognises its obligations in relation to the use, handling, storage, transportation and waste of substances.

It fulfils these obligations through the following activities:

**Risk Assessment**

Before use, substances are subject to risk assessment by a competent person, where the steps necessary to comply with legislation are identified and implemented. Risk assessments consider both chemicals that are brought onto the premises, and the chemicals that are created on site, for example through chemical reactions in science laboratories.

Risk assessments are carried out by a competent person that understands how the work activity uses, produces or creates substances, has the ability and authority to collate the relevant information, and has the knowledge, skills, training and experience to make sound judgements about the level of risk and the measures needed for prevention.

COSHH risk assessments consider:

* The potential for harm from different types of exposure
* The physical attributes of the substance
* How and when exposure can occur and who may be affected
* The effectiveness of existing controls, and the options for improving control when prevention is not an option.

In order for Risk Assessments to be suitable and sufficient, they must comply with the approved code of practice which requires risk assessments to consider the following:

* The work activity
* The hazards
* The people exposed
* The types and extent of exposure
* The potential health effects
* Suitable control measures
* Any additional requirements

**Prevention or Control of Exposure**

Wherever possible, exposure to substances hazardous to health should be avoided – either by changing working methods, modifying processes to eliminate risks, or substituting non-hazardous chemicals. One example might be to safely dispose of chemicals that are no longer required, or to use a less concentrated form of the same chemical.

Where it is not possible to prevent the use of a substance hazardous to health, protection measures should be adopted in the following order of priority:

* Design and use of appropriate work processes, systems and engineering controls
* The control of exposure at source
* The provision of suitable Personal Protective Equipment (PPE)

Where PPE is necessary, adequate consideration will be given to suitable respiratory or personal protective equipment.

Where substances are used and stored, adequate facilities will be provided for washing, storing clothes, changing, eating and drinking.

**Maintenance Examination and Testing of Control Measures**

Where engineering, exposure or PPE controls have been established, a system of maintenance, examination and testing shall be implemented to ensure that the equipment is safe. Where local exhaust ventilation is used (for example in fume cabinets), the frequency of thorough examination will not be less than once every fourteen months, and suitable records will be retained.

**Exposure monitoring and health surveillance**

Where employees and others are regularly exposed, or have the potential to be regularly exposed, to substances hazardous to health and exposure monitoring is possible, routine assessments will be carried out and the results will be shared with employees.

Health surveillance will be undertaken on employees where they have regular or routine exposure to dangerous substances which may cause an identifiable disease or adverse health effect (this could include bricklaying, hairdressing, or science subjects), where there is a reasonable likelihood that the disease or effect may occur under their working conditions, and a valid technique exists.

**Information, Instruction and Training**

Every employee who may be exposed to dangerous substances through work activities must be advised of the names of any substances, relevant workplace exposure limits, access to a relevant safety data sheet, and any other specific regulatory matters that apply to those substances.

Employees are also notified of significant findings of risk assessments, appropriate precautions to remain safe, and the results of any relevant monitoring or surveillance activities.

Where chemicals or substances are stored in containers or pipes, the contents of those containers or pipes, together with the nature of those contents and any associated hazards will be clearly identifiable. In particular, hazardous substances will clearly display the international standard pictogram (black image on a white background within a red diamond), a signal word (if appropriate) either ‘Danger’ or ‘Warning’, and any relevant hazard statement.

Information, instruction and training will be provided at timely intervals and in response to any changes to processes, substances, or the findings from monitoring or surveillance activities.

**Arrangements to deal with accidents, incidents and emergencies**

United Colleges Group sites use gas for heating and for learning purposes (for example the use of Bunsen burners in science labs, oxy-fuel gas welding equipment, maintenance and estate systems). These are supplied via gas cylinders or gas pipes which are clearly marked and isolated when not in use.

Flammable gasses are stored in cylinders. When not in use, cylinders are stored away from the main building. Cylinders are suitably stored, secured, locked, and protected in a manner that is safe and protects sensitive components such as valves. When used, they are always attached through the correct fittings.

Diesel is used in fire pumping equipment at one or more locations. Diesel storage is kept to a minimum within main buildings. Where plant equipment is in the basement of the main building, a sprinkler system has been installed to extinguish the fire and prevent fire spread. Detection equipment deployed at each centre enables fire or release detection linked to emergency alarms to trigger site evacuations as necessary.

A variety of flammable substances are stored on site. Chemicals are stored in locked and secured facilities within the main building. There is restricted access to these stores. These facilities are not directly in the path of emergency exits. Wherever possible, chemical storage facilities are well ventilated, away from potential ignition sources, kept in suitable lidded containers, and on suitable catchment trays to prevent spillages from spreading. Flammable liquids must be stored in a protected area.

Acids and corrosive substances are stored and used in some areas. These chemicals are tightly controlled. A full stock list is held and these chemicals are stored and locked away until needed. These chemicals have gained recent notoriety following television and radio coverage where they have been used as offensive weapons. There is some evidence of links between chemical and gang crime. The home office recommends the following best practice:

* Identify which chemicals pose significant risks
* Store the chemicals safely and securely in a unit with good quality doors and windows, solid walls, strong locking devices, and a security alarm.
* Provide adequate ventilation
* Manage use – for example through lesson requisition sheets and controlled use
* Manage chemical quantities – by removing unnecessary chemicals, minimising stock quantities, and minimising vessels holding the same substances, regular stock takes, and managed disposal
* Minimise the number of people with access to these chemicals, ensure they are trained, and have the means and knowledge to maintain audits, and provide them with a manager who they can confide in
* Maintain good administrative controls for purchase, storage, use and disposal
* Promptly report missing chemicals to the anti-terrorism hotline on 0800 789321

The Home Office recommends asking the question ‘can you tell if anything is missing?’

Some products (for example those in hairdressing and beauty) may contain organic peroxides, which can explode if they are not stored or handled correctly. Other substance (for example in science areas) can react vigorously with incompatible materials or contaminants (such as sodium which can ignite in contact with water).

Information on substances is made available to the emergency services routinely in preparation for events and is available at command and control locations. This list is routinely updated.

## **REVIEWING AND AUDITING PERFORMANCE**

The Strategic Leadership Team member responsible for any department should be aware of the hazardous substances used within their department. These include the use of Liquid Petroleum Gas, Diesel, flammable gasses and other substances, acids and corrosive substances (particularly those on the Home Office Chemicals causing most concern list’)

The list identifies whether a current safety data sheet is held, whether a COSHH risk assessment has been carried out, and whether any additional control measures are deemed necessary. In any event, additional control measures which have not been implemented should be listed in department action plans.

The results of monitoring and surveillance activities, particularly where monitoring denotes readings above workplace exposure limits, and summary information on health surveillance results are shared with the Strategic Leadership Team.

Summary information relating to employees’ information, instructions and training should also be routinely reviewed by the Strategic Leadership Team.

The Safety Committee have access to lists of substances by department, whether safety data sheets and risk assessments exist for those chemicals. They also have access to the results of monitoring and summary health surveillance data (which does not breach personal data protection guidance).