

Hazardous Substances Policy

| | |
|------------------|-------------------------------------|
| Document Title | Hazardous Substances Policy |
| Reference Number | HS-0430 |
| Version Number | V2.1 |
| Latest Revision | November 2019 |
| Next Review Due | November 2022 |
| Distribution | All Employees and Volunteers |
| Owner | healthandsafety@nas.org.uk |
| Policy Lead | National Lead for Health and Safety |

Scope

This policy does not deal with every hazardous substance that may be encountered in the workplace, but it seeks to enable assessors to conduct suitable and sufficient COSHH (Control of Substances Hazardous to Health) assessments for a range low risk hazardous substances that may be encountered in the NAS.

The Health and Safety Executive, Department of Health and other national bodies have introduced regulations and guidance for substances that pose a significant health risk. The NAS has specific policies to deal with particular hazardous substances, for example:

- Asbestos Management HS-0431
- Legionnaires Disease Precautions HS-0432

It is important that advice is sought from the Health and Safety Team when other high risk substances, falling outside the scope of this policy, need to be assessed.

The NAS Infection Control Policy HS-0411 should be referred to when considering biological hazards.

Policy Summary

To assist managers identify hazardous substances in their area of responsibility. This policy shows how substances must be assessed and controlled. It also sets out monitoring and education strategies in order to reduce the risk of harm to those who could be affected by them.

Introduction

NAS managers must control substances hazardous to health and all employees and volunteers must comply with any control measures which have been introduced for their safety and the safety of others. Special consideration will be given to those who may be more vulnerable including people who use our services.

The hazards, which a particular substance may present, will not always be obvious and there can, sometimes, be a detrimental effect on health which is only recognised many years after exposure to the substance. For example, asbestos can cause severe health problems 30 to 40 years after exposure.

Substances hazardous to health often find their way into the workplace in bottles and packages. These are fairly easy to control because the manufacturer is required by law to provide health and safety information so that the risks to health can be controlled.

It is sometimes difficult to identify substances, which have been decanted into other containers or transferred to other packaging, and this practice should be avoided. Inadequate labelling or packaging must never compromise people's health and safety.

People working for the NAS and the people they support may need to be protected from biological hazards which are not so easy to identify or control for example, hazards associated with body fluids and clinical waste, Hepatitis B, HIV, etc.

Tasks carried out in the workplace can also produce less obvious health hazards which must nevertheless be controlled, e.g. dust created when sawing hardwoods and MDF.

The NAS will comply with the requirements of the Control of Substances Hazardous to Health Regulations 1999 and the associated Approved Code of Practice (ACOP) by controlling substances in the following manner:

| | |
|--------|--|
| Step 1 | Assessing the risks |
| Step 2 | Controlling the risks |
| Step 3 | Monitoring (if necessary) |
| Step 4 | Ensuring employees are properly informed, trained and supervised |

Step 1 – Assessing the Risks

- 1.1 To determine which substances might be hazardous to health in a particular workplace a list of substances must firstly be drawn up and hazardous substances must then be identified from the list. It is important to remember substances that are less obvious, as described in the introduction to this policy.

- 1.2 Substances hazardous to health can often be identified from packaging which may exhibit a symbol. These substances will have been packaged in accordance with the Chemicals (Hazard Information and Packaging for Supply) Regulations 1994 (as amended) (CHIP). The supplier will also provide a safety data sheet.
- 1.3 Substances which have occupational exposure limits (OELs) shown on the safety data sheet should not normally be used but where this is unavoidable then the Health and safety Team should be contacted for guidance.
- 1.4 In determining which substances could be hazardous to health consideration must be given to the ways that the substances could enter the body, for example
 - absorbed through the skin,
 - swallowed because of the substance getting into the mouth from contaminated hands during eating or smoking,
 - inhaled dusts, fumes, gases, vapours or mists,
 - injection through punctured skin.
- 1.5 The risks that any of the substances present to people's health will depend on:
 - how much of the substance is in use,
 - how people could be exposed to the substance,
 - who could be exposed to the substance (Note: service users, contractors, visitors, volunteers, etc will need to be considered in addition to employees),
 - any pre-existing medical conditions, e.g. asthma, eczema, etc.
 - vulnerability due to ASD,
 - how often people could be exposed to the substance.
- 1.6 Employees should be involved in the identification of hazardous substances and completion of any relevant risk assessments, and in any case must always be informed of the results of the assessments.
- 1.7 The person carrying out the assessment must be competent and have sufficient knowledge and experience of the operation of the workplace in order to make suitable assessments.
- 1.8 The following list can be used to check what hazardous substances may be in use generally in the NAS but it should be understood that the checklist is no substitute for a thorough check of the specific hazardous substances which may be present in a specific workplace.
 - disinfectants
 - detergents
 - latex gloves
 - cleaning chemicals
 - oven cleaners
 - de-scaling chemicals
 - dishwasher products
 - clinical waste
 - soiled laundry
 - body fluids

- household plant cleaners or fertilisers
- fish tank water
- printer cartridges and toner
- correction fluid
- pesticides
- fertilisers
- adhesives
- paints and paint thinners
- paint stripper
- wood dust
- cement
- creosote
- petrol
- engine and other mineral oils

Consideration must also be given to substances which may not pose a significant hazard to employees but could be extremely harmful to some service users. For example:

- Garden plants and shrubs
- Toiletries

1.9 Assessments must be recorded to clearly show the significant risks and control measures. They must be considered as a “living” document and must be reviewed at least every year or if they are no longer valid.

Step 2 – Controlling the Risks

2.1 The COSHH regulations require prevention of exposure to substances hazardous to health so far as is reasonably practicable. The measures which will be considered by the NAS to reduce the risks are shown below in order of preference:

- Eliminate the hazardous substance.
- Substitute the substance for one which is safer, e.g. find an alternative to bleach. Use the substance in a different form, e.g. pellets instead of powder.
- Contain the process by enclosing it or providing proper extract equipment, e.g. for woodcutting.
- Alter the working method to minimise the likelihood of spills, e.g. clinical waste deposited in bags which are then carefully sealed before transportation.
- Reduce the number of employees exposed and the duration of their exposure to the hazardous substance. Where exposure cannot be adequately controlled then personal protective equipment (PPE) must be used as a last resort. PPE must be worn, stored and maintained correctly.

2.2 It is vital to ensure that the control measures are used and that any defects are reported to the manager responsible.

- 2.3 Any controls, which have been put in place, must be maintained effectively. For example, kitchen extract systems that have been put in place to extract heat and carbon monoxide must be maintained to operate efficiently.

Step 3 – Monitoring

- 3.1 Where there is a possibility that the air breathed in could cause health problems then there is a requirement for the NAS to carry out air monitoring. It is unlikely that this would normally need to be undertaken in the NAS but the Health and Safety Team must be contacted where it is perceived that this is required.
- 3.2 Health surveillance needs to be carried out for employees who are working with certain compounds and where, for example, dermatitis or asthma could be caused by substances at work.

Step 4 – Ensuring that Employees and Volunteers are Properly Informed, Trained and Supervised

- 4.1 Those working for the organisation must be informed of the outcome of any assessments through user information sheets.
- 4.2 Those working for the organisation must be provided with suitable information, instruction and training about:
- the nature of the substances they work with or are exposed to and the risks created by exposure to those substances,
 - the precautions they should take for themselves and others,
 - the control measures, their purpose and how to use them,
 - how to use PPE and clothing provided,
 - results of any exposure monitoring and health surveillance (anonymously),
 - emergency procedures.

Records

Records must be maintained to show how hazardous substances are controlled at each work place. The records must be kept for forty years.

The records will comprise data sheets and COSHH Risk Assessments and User Information Sheets (see appendix). The record forms will, in turn, refer out to other related documentation where necessary, e.g. training records.

The record form will identify the substance, confirm that a data sheet is available, list hazards and give details of the controls which are in force.

Key Management Actions

- Assess hazardous substances and introduce suitable controls.
- Monitor procedures and where necessary monitor ill-health effects.
- Ensure that all staff (and others) are made aware of any risks to their health and the measures that have been introduced to control exposure.
- Review assessments.

COSHH RISK ASSESSMENT

| | | | |
|---|---|---------------------|----------|
| Directorate: | | Department: | |
| Process: | | Site: | |
| Assessors Name: | | Date of assessment: | |
| Product / Substance Name | | Current risk rating | |
| List of substances taken from the Material Safety Data Sheet (MSDS) – Section 2 | | | |
| Composition / ingredient | % | WEL | Short TE |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Classification: Irritant Xi / Harmful Xn / Corrosive C / Toxic T / Flammable F / Carcinogen / Teratogen / Sensitiser / Infectious agent / Other (outline detail above).

Use of the substance

| | | | | |
|------------------------------|---------------------|---------------|-------------|-----------|
| Where is the substance used? | | | | |
| No | Work Activity / SOP | Task Duration | Volume Used | Frequency |
| | | | | |
| | | | | |
| | | | | |

Where there is deliberate work with biological agents you must ensure that controls are in line with guidance

| | | | | | | | |
|---|--|--------------------|--|---------------------------------------|--|------------------------|--|
| Are biological agents present in the process? | | Classify the agent | | Does this present an additional risk? | | Are controls adequate? | |
|---|--|--------------------|--|---------------------------------------|--|------------------------|--|

Staff numbers / groups exposed:

Physical & chemical properties

| | | | | | |
|---|--|--------------------|--|-----------------|--|
| Boiling Point – lowest figure stated on MSDS | | Vapour pressure: | | Reference temp: | |
| Operating temp Highest temp chemical is likely to reach – if room temp state as 25°C: | | Nature of product: | | | |
| | | other: | | | |

Route(s) of entry and health effects

| | |
|----------------|--------------------------|
| Route of entry | Health effects from MSDS |
| Skin Contact | |
| Eye Contact | |
| Inhalation | |
| Ingestion | |

Risk Control

| | |
|---|----------|
| Can the work activity be eliminated? | Yes / No |
| Can the product be replaced by a less hazardous one? Attach the substitution assessment document to this assessment. | Yes / No |
| Additional information: | |

| Existing control measures | Route of entry controlled | Adequately controlled Y/N/? |
|---------------------------|---------------------------|-----------------------------|
| | | |
| | | |

| Identify other chemicals used in this process that may produce combined effects or bi-product: | | | |
|--|--------------|---------------------|-------------------|
| Chemical Name | COSHH RA No. | Effect / bi-product | Controls in place |
| | | | |
| | | | |

Additional information to be considered:

| Assessment of risk: | | | |
|---------------------|------------|------------------------|-------------|
| Route of entry | Likelihood | Severity – consequence | Risk Rating |
| | | | |
| | | | |

| Additional Controls required (where necessary): | | | |
|---|--------|--------------------|------------------|
| No. | Detail | Person Responsible | Completion date: |
| | | | |
| | | | |

| Temporary risk reduction measures: | | | |
|------------------------------------|--------|--------------------|------------------|
| No. | Detail | Person Responsible | Completion date: |
| | | | |
| | | | |

| Re-assessment of risk rating (when additional controls are in place) | | | |
|--|------------|------------------------|-------------|
| Route of entry | Likelihood | Severity – consequence | Risk Rating |
| | | | |
| | | | |

Assessors(s) signature(s)

| | | |
|-------|-------------|---|
| 1-5 | Low | Use with controls identified |
| 6-10 | Medium | Consider substitution |
| 11-15 | Moderate | Seek advice from healthandsafety@nas.org.uk |
| 16-20 | High | Seek advice from healthandsafety@nas.org.uk |
| 21-25 | Significant | Do not use - substitute |

I consider that this assessment is suitable and sufficient. I take responsibility for the additional control measures identified. I consider that residual risk falls within acceptable/tolerable levels.

| | | | |
|----------------|--|---------------------|--|
| Managers Name: | | Signature: | |
| Date: | | Current risk rating | |
| | | Review date: | |

COSHH USER INFORMATION SHEET

All staff must follow this procedure and ensure that instructions are complied with when using, handling, storing and disposing of this substance

| | | | | | |
|--------------------------|---|----------------|----------------|----------------------|--|
| Product / Substance Name | | | | Current risk rating: | |
| Composition | % | Classification | Safety Phrases | | |
| | | | | | |
| | | | | | |
| | | | | | |

| | | | |
|--|--|-------------|-----------|
| Training: <i>Before you use this chemical</i> | <ul style="list-style-type: none"> All staff must be Induction trained prior to using this product this must include online training, face to face dangerous substance training Site specific induction training to be completed | | |
| Work Activity | Task Duration | Volume Used | Frequency |
| | | | |
| | | | |

| RISKS | |
|--------------------|--|
| Route(s) of entry: | |
| Skin Contact: | |
| Eye Contact: | |
| Inhalation: | |
| Ingestion: | |

| Staff numbers / groups exposed: | |
|--|--|
| Control Measures - Precautions Necessary in Handling / Use / Storage | |
| | |
| Disposal Arrangements | |

| EMERGENCY ACTIONS | | | |
|------------------------|--|------------|--|
| First aid Arrangements | | | |
| Spillage procedure | | | |
| Fire arrangements | | | |
| Managers Name: | | Signature: | |
| Date: | | Review: | |

Control of Substances Hazardous to Health – Substitution Assessment

| | |
|---------------------|--|
| Hazardous substance | |
| Date of assessment | |

| Step 1 | | | | |
|-----------------------------|--|-------------|------------|-------------|
| Is the substance hazardous? | Current risk rating from the COSHH assessment: | | | |
| | Domain | Consequence | Likelihood | Risk Rating |
| Storage risk: | | | | |
| Use (process) risk: | | | | |
| Disposal risk: | | | | |
| Other: | | | | |

| Stage 2 - Identify alternatives: | |
|----------------------------------|----------------------------|
| Chemical Name | COSHH Assessment findings: |
| | |
| | |

| Stage 3 - What could happen if you use the alternatives? | | | | | |
|--|--------------|-----|----------|---------|-----------------|
| Chemical Name | COSHH Rating | Use | Disposal | Storage | Other i.e. cost |
| | | | | | |
| | | | | | |

| Stage 4 - Compare the alternatives with each other and with the substance or process you are using at the moment | | | |
|--|------------|---------------|--------------|
| Chemical name | Advantages | Disadvantages | Overall risk |
| | | | |
| | | | |
| | | | |

| Stage 5 - Decide whether to substitute |
|--|
| |

| Stage 6 - Introduce the substitute – What, Who and When? |
|--|
| |

| Stage 7 - Assess how it is working |
|------------------------------------|
| |

| | | | |
|-----------------|--|------------|--|
| Assessors name: | | Signature: | |
| Managers name: | | Signature: | |
| Review date: | | | |