CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

INTRODUCTION

This guidance and procedures document sets down the standards for the control of hazardous substances used throughout the department. It is intended to assist those persons responsible to meet the requirements of current legislation and act as a source of guidance on how to control the risk from the use of such substances to members of staff and others who may be exposed.

Over and above the general duty of care owed by the department to staff and others under the Health and Safety at Work etc. Act 1974, hazardous substances are specifically legislated for by the Control of Substances Hazardous to Health Regulations 1999 (COSHH).

The Regulations contain detailed statutory requirements with respect to the identification, use and control of such substances. Their main aim is to ensure that where a need for the use of a hazardous substance is required, that the situation is assessed and appropriate control measures are taken.

REGULATIONS

The Control of Substances Hazardous to Health Regulations 1999 require specifically the following:

- An assessment of all hazardous substances used in the workplace
- Control of the risk of personnel being exposed to hazardous substances
- Monitoring of the effectiveness of control measures
- Maintaining in an efficient condition any equipment provided to control the risk (e.g. local exhaust ventilation LEV, personal protective equipment PPE).
- Health Surveillance
• Informing, instructing and training of personnel on the level of risk and how it is to be controlled.

**SO WHAT IS A HAZARDOUS SUBSTANCE?**

The Control of Substances Hazardous to Health Regulations 1999 define 5 categories of hazardous substances which are:

• Substances classified as harmful, irritant, toxic, very toxic and corrosive, such substances will carry the pictograms detailed below

![Pictograms for hazardous substances](image)

• Substances which have a maximum exposure limit (MEL) or an occupational exposure standard (OES) assigned to them (examples would include chlorine, ammonia, wood dusts)

• Biological agents capable of causing ill health effect, i.e. any micro-organism, cell, culture, genetically modified organism that may cause infection, allergy, toxicity or any other human health hazard

• Substantial quantities of dust

• Any other substance not classified above that may create a comparable health risk.

The only exceptions are those things which are already being controlled by their own specific legislation, for example, asbestos, lead, radioactive substances.

In the Education Department these substances will generally be found in school laboratories, school practical workshops, print rooms. Caretakers and cleaners stores in all premises are also likely to contain such substances.

**RESPONSIBILITIES**

It will be the responsibility of the Director of Education to ensure that the Regulations are adhered to throughout the department.

Headteachers and other Managers will ensure that where the use of hazardous substances is required, that a risk assessment is made and appropriate controls are in place.

Headteachers and other Managers will ensure that any equipment used to control the risk from hazardous substances are adequately maintained in an efficient condition.

Headteachers and other Managers will ensure that at risk staff are informed of the risk and the control measures in place to reduce it.
REQUIREMENTS

Assessment

The task of identifying all hazardous substances used throughout the department is enormous. In order to simplify matters somewhat, a number of generic risk assessments have been produced. The following generic assessment documents should be available in all premises to which they refer.

School Science:

- ‘Hazcards’, produced by the Consortium of Local Education Authorities for the Provision of Science Services (CLEAPSS)
- ‘Topics in Safety’, produced by the Association of Science Education (ASE)
- Safety in Science Education, produced by the DfEE.

The above documents contain detailed risk assessments for substances and experiments required in the science curriculum. All secondary school science departments should have copies and be using these documents regularly.

In situations which are not adequately covered by these documents CLEAPSS will, if requested, provide a specific risk assessment

Design and Technology:

- Risk Assessments for Technology in Secondary Schools, produced by CLEAPSS

Codes of Practice:

Codes of Practice have been developed covering the following work areas:

- Design and Technology
- Science
- Art
- Primary School Curricular Activities
- School Caretaking
- Swimming Pools

The above codes have been written on the basis of a risk assessment and have pre-identified the types of hazardous substances required for these work areas and outlined controls to reduce risk.

Persons in control of such work areas should ensure that these documents are available to all relevant staff and that the controls outlined are in place and operating effectively.
The above mentioned generic assessment documents will go a long way in ensuring that all substances are being adequately assessed. In the event however, that you may have a substance not covered by any of the above documents, an assessment will be required.

To cover such an eventuality the Health and Safety Section of Corporate Personnel operate an assessment service, this is a free service and details of how it operates can be found in Annexe 1 to this document. Headteachers and other Managers shall ensure that this service is used whenever they have substances not covered by the general assessment documents or CLEAPSS are unable to assist.

Control

Exposure to hazardous substances must either be prevented or controlled. Where it is reasonably practicable to prevent exposure then this must be done. If not then certain controls must be initiated to reduce exposure.

Where the course of action is to control, it will not be deemed sufficient to just supply some form of protective clothing like gloves or masks, these should be thought of as a last resort and only when more, at source, controls are not practicable.

For example, fume cupboards in science labs, local exhaust ventilation systems on woodworking machinery should always take precedence over masks. However, if practical measures to control the substances are not reasonable or not adequate when used alone, then PPE will need to be provided for use by staff and pupils if affected.

Monitoring

All reasonable steps must be taken to ensure that the control measures put in place are complied with. This will require the development of supervisory inspection systems. Reporting procedures for defective equipment will also be required.

Monitoring the effectiveness of control systems may also require personal exposure monitoring for example, technicians in design and technology workshops may have their personal exposure to wood dust monitored in order to determine the efficiency or otherwise of the LEV systems in place.

Maintenance of Control Equipment

Control measures must be maintained in an efficient working order and in good repair.

This will require visual and operational checks on equipment before use. In addition there will be a requirement for annual testing and certification of local exhaust ventilation systems such as, fume cupboards and extraction for woodworking machinery, welding bays, etc. Section 14 “Provision and Use of Work Equipment” of the Health and Safety Manual also gives details on the requirements to maintain such equipment.

Records of such maintenance must be kept on the premises to which they refer.
Health Surveillance

Health surveillance of employees must be carried out in certain circumstances. It is not expected that surveillance will normally be required in the department other than for school technical technicians and teachers exposed to wood dusts. You should turn to the relevant Code of Practice for further information.

Information, Instruction and Training

Those undertaking work with hazardous substances must be provided with sufficient information, instruction and training to enable them to undertake their work safely, to know the risks involved in their work and the necessary precautions to be taken.

Additionally, it will be necessary to inform pupils or young persons who may be exposed to hazardous substances of the risks, and the measures put in pace to control the risk.

FURTHER INFORMATION

Further information can be found in the following publications:

- COSHH “Guidance for Managers and Supervisors” Issued by Norfolk County Council Personnel Section March 1996
- A Step by Step Guide to COSHH Assessment. HS (G) 97 HSE Books
- Topics in Safety. Association for Science Education (ASE) ISBN 0 86357 104 2
- HAZCARDS from CLEAPSS
- COSHH. Guidance for schools ISBN 0 11 885511 5
- Approved Code of Practice. Control of Substances Hazardous to Health Regulations 1994. ISBN 0 7176 0819 0
- Safety in Science Education. DfEE ISBN 011270915x
- Risk Assessments for Technology in Secondary Schools. CLEAPSS.
ANNEXE 1

RISK ASSESSMENT OF HAZARDOUS SUBSTANCES

INTRODUCTION

As mentioned in the main part of this guidance and procedures document the requirement to risk assess hazardous substances has, in the main, been carried out generically by virtue of published texts including, HAZCARDS from CLEAPSS, ‘Topics in Safety’ from the ASE and the various ‘Codes of Practice’ produced by the Education Department.

If however, you are required to use a substance which is not covered by the above documents then a full assessment will be required. This Annexe details the system which is in operation to assist you in this area.

The Health and Safety Section of Corporate Personnel operates a COSHH assessment service to all departments, the service is free to all users. It consists of the Sypol COSHH Management System, a database of information which is able to produce an assessment if given sufficient information on the substance, usage, personnel involved, location, etc.

COSHH MANAGEMENT SYSTEM

The system operates using the following documentation:

Material Safety Data Sheet.

All manufactures are required by law to produce a Material Safety Data Sheet, this document gives details on a 16 point schedule of; the composition of the substance, hazards, first aid measures, fire fighting measures, etc. (See example at Appendix 1). This document is essential if an assessment is to be made and can be requested from manufacturers or suppliers who will send or FAX the document directly to you.

COSHH Assessment Request Form (CARQ)

The CARQ form is necessary for the compilation of accurate assessments.

Information required on the CARQ is as follows:

- Department and Section or Premises
- Product Name and Supplier/Manufacturer
- Product label information i.e. toxic, corrosive, etc.
- Information on usage such as duration, location
- Description of the work method, i.e. hand painting, spraying etc.
It is essential that this form is fully completed and as much information as possible about the work method is given.

Norfolk County Council COSHH Assessment Sheet

This is the document which is produced by the database after it is fed the information from the above two documents. It will effectively be the operational procedure document and will dictate how you will control the risk of exposure to the hazardous substance.

The Assessment Sheet contains a number of pieces of information and uses pictograms to indicate control measures necessary (See example in Appendix 1)

PROCEDURE

Once you have identified a substance which requires an assessment you will need to take the following action:

- Obtain a Material Safety Data Sheet from the manufacturer or supplier
- Complete the CARQ Form giving as much information as is possible
- Send both documents or, if a number of substances are being assessed, documents for each substance, to the Health and Safety Section of Corporate Personnel, fourth floor, County Hall.

The Health and Safety Section of Corporate Personnel will then carry out the assessment on your behalf and return to you the following:

- Material Safety Data Sheet
- Your original CARQ form
- A Norfolk County Council COSHH Assessment Sheet

When you receive these documents you will then be required to put in place the measures indicated on the Control of Substances Hazardous to Health Regulations 1999 assessment sheet. You will also be required to maintain records of all Assessment Sheets received and ensure all relevant staff are made aware of the arrangements.

EXAMPLES

Master copies of the required documentation are included in Appendix 1 together with a worked example for the use of Methylated Spirit.
HYPODERMIC SYRINGES, NEEDLES AND LANCETS

GUIDANCE ON RISKS AND SAFE DISPOSAL

DEFINITION AND OVERVIEW

The number of discarded hypodermic syringes, needles and lancets (devices for taking very small samples of blood by puncturing the skin) found on Education Department premises in recent years has increased significantly.

If, as part of general risk assessment, managers of premises determine that syringes, needles or lancets are being found regularly on site, the procedures laid down in this document should be followed. This annex identifies the risks involved and outlines the factors that need to be considered to ensure that such items are collected and disposed of safely.

WHAT IS THE RISK?

Needlestick injuries are skin punctures caused by hypodermic needles. This can lead to transmission of the pathogens which cause Hepatitis B and C, Human Immunodeficiency (HIV) and Tetanus viruses.

Needlestick injuries are a well known risk in medical and veterinary work. Although education premises are much less likely to encounter this risk, it is important that the following procedure is followed on the occasions that used syringes, needles and lancets are found.

WHERE COULD SYRINGES, NEEDLES AND LANCETS BE FOUND?

Discarded needles could be found anywhere on the site. The following are the areas in which needles etc. are more likely to be found: -

♦ Toilets
♦ Litter bins
♦ Refuse sacks
♦ Playgrounds
♦ Site grounds or playing field
♦ Disused/vacated buildings

Some of the needles found in children’s playgrounds are known to have been deliberately placed, e.g. wedged in slides or buried in sandpits.

WHO IS AT RISK?

The following persons may be at risk from needlestick injuries: -
♦ Caretaker/Site Manager
♦ Other members of staff
♦ Contractors (eg. cleaners, refuse collection, grounds maintenance contractors)
♦ Pupils/Students
♦ Visitors

CONTROL MEASURES

Where the general risk assessment suggests that needles are likely to be found regularly, the following action should be taken in advance of further needle finds:

♦ Obtain Syringe/Needle Disposal Kit (item 31576, £2.20 each, ESPO General Catalogue 2000-2001, page 545).

♦ Identify staff who will collect discarded needles and brief them and other employees on what to do when needle/s found and risks involved.

Schools and other establishments are not required to obtain syringe/needle disposal kits. The decision to do so rests with the person in charge of the premises and will be based on the findings of the general risk assessment.

If a needle/syringe is found:

♦ Use rubber gloves from disposal kit
♦ Use tongs/tweezers from kit to pick up
♦ Deposit needles and used tweezers in sharps container from kit and seal
♦ Store Syringe/Needle Disposal Kit in a safe place

DISPOSAL

Most local Councils will collect and dispose of single or small numbers of needles free of charge and will respond promptly once notified. Services available in each area are as follows:

Breckland Council - Free collection/disposal service. Contact Public Services Department on 01362 695333.

Broadland District Council – No collection/disposal service is available from Broadland District Council. Schools and other establishments in this area should contact a clinical waste disposal contractor, eg PHS on 01379 651061.

Great Yarmouth Borough Council - Free collection/disposal service. Contact Refuse and Street Cleansing Department on 01493 846100.

King’s Lynn & West Norfolk Borough Council - Free collection/disposal service. Contact Environmental Health Department on 01553 616589.
North Norfolk District Council - A charge of £8.75 will be made for collection/disposal. Contact Contracts Division on 01263 516189.

Norwich City Council - Free collection/disposal service. Contact Environmental Health Department on 01603 212314.

South Norfolk District Council - Free collection/disposal service. Contact Environmental Health Department on 01508 533706.

In the event that premises find needles frequently, a formal arrangement with a clinical waste disposal contractor should be considered. Contact the appropriate District Council for advice in the first instance in this circumstance.

**RECORDING NEEDLE FINDS**

Persons in charge of premises should record needle finds in an incident book or equivalent kept on site. Information held here will assist with future risk assessments and help to identify possible improvements in e.g. site security or staff training.

**REPORTING NEEDLESTICK INJURIES**

Needlestick injuries are not reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR), but any resulting infection may be.

**FIRST AID**

In the unlikely event of injury from a needlestick the following first aid treatment must be carried out: -

♦ Bleed it - bleeding from the wound should be encouraged. Do not suck it.
♦ Wash it – wash well under cold running water without soap.
♦ Cover it - cover with a dry dressing.
♦ See GP – seek medical advice as soon as possible.

Refer to section 10 of Departmental Health and Safety Manual for guidance on First Aid.