

# Hale Village Hall New Forest (CIO)

Charity Registration Number 1175048

## COSHH POLICY 2024



### Meeting the requirements of COSHH

Hale Village Hall Management Committee acknowledges the requirements of the Control of Substances Hazardous to Health (COSHH) Regulations 2002. The Management Committee will meet its obligations under these Regulations as follows:-

- 1) by following the statement made in the Management Committee's Health & Safety Policy, namely
  - When using a harmful substances, whether it is a material, cleaning fluid or chemical substance, personnel must ensure that adequate precautions are taken to prevent ill-health
  - No new materials or chemical substances are to be brought into use unless a COSHH assessment under the Control of Substances Hazardous to Health Regulations 2002 has been carried out and clearance given for use by the Head Teacher
  - Staff must not attempt to use a harmful substance unless suitably trained to do so
  - Harmful substances are to be stored in the secure storage when not in use
- 2) by keeping an up-to-date inventory of all substances purchased or brought into the Management Committee which may be considered to pose a risk to staff, pupils, visitors and contractors

The Management Committee will also seek to obtain safety data sheets for all products that may come into contact with any staff member Committee member or other user including contractors which although not classified as hazardous (i.e not requiring hazard labelling under the Chemicals (Hazard Information and packaging for Supply) Regulations ) may still have the potential to cause harm if they are inhaled, ingested, injected or absorbed through the skin. An inventory of these products will also be kept.

The Management Committee will monitor and review this policy on a three yearly basis in order to ensure ongoing compliance with legislation and effective operational practice.

## **OPERATIONAL REQUIREMENTS**

### **Introduction**

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 provides the legal framework to protect people against health risks from hazardous substances at work. The regulations require employers to adequately assess the risk to health arising from work activities, to control exposure to hazardous substances and to protect both staff and others, who may be exposed, including the environment.

### **Scope**

The term hazardous substance describes a wide range of substances with the potential to cause harm if they are inhaled, ingested, injected or absorbed through the skin or released into the environment. Common substances such as cleaning materials, herbicides and pesticides can be hazardous and/or harmful to the environment.

Hazardous substances occur in the following forms from packaged item or work process:

- Substances or a mixture of substances classified as dangerous which carry warnings such as Toxic, Very Toxic, Harmful, Corrosive, Irritant, Sensitising or Carcinogenic
- Substances with Workplace Exposure Limits (WEL)  
Workplace Exposure Limits have replaced the Maximum Exposure Limit (MEL) and Occupational Exposure Standard (OES). Substances with WEL's are listed in EH40.
- Biological agents (bacteria, viruses and other micro-organisms)
- Any kind of dust in a specific concentration
- Any other substances which create a risk to health, e.g. dusts, liquids, vapours, gases, mist, fibres, solids or smoke.

These substances usually indicate their basic hazard group by their warning label; pre-2009 these were of a black symbol against an orange background to comply with the CHIP regulations and a list of these is attached as **Appendix 1**. With the adoption of the European CLP Regulation in 2009, new symbols were introduced using symbols of a white background, red edging and black symbol within, and a list of these will be found in **Appendix 2**.

Some substances are excluded from the COSHH regulations but are covered by their own specific regulations. These include:

- Radioactive materials
- Asbestos
- Lead and lead products
- Material hazardous due to flammability only (these fall under Dangerous Substances and Explosive Atmosphere Regulations (DSEAR))
- Substances used for medical treatment.

## **Responsibility**

The Chair of the Hale Village Hall Management Committee has the overall responsibility for the implementation of this policy under the COSHH regulations, who will make adequate arrangements to ensure, so far as is reasonably practicable, that staff and all other users follow safe systems of work thus minimising the risk.

The Chair's responsibilities include:

### **Safe systems of work**

- Establishing the system for complying with the regulation, including individual responsibilities and informing staff of these
- Identifying the hazardous substances used in the workplace and ascertaining the risks from using these substances
- Considering whether the substances are definitely needed or whether a safer substance could be used
- Undertaking risk assessments to account for all working practices in the directorate in which the hazardous exposure may occur
- Preventing people being exposed to hazardous substances, but where this is not possible, controlling the exposure
- Restricting the use of hazardous substances to nominated staff
- Deciding what precautions are needed before starting work with a hazardous substance
- Sharing the results of COSHH risk assessments and notifying other bodies of actions to be taken.

### **Purchasing**

- Ensuring any new product ordered comes with its Material Safety Data Sheet (MSDS) and that COSHH risk assessment is undertaken before the substance is used.

### **Storage**

- Ensuring stocks of substances are kept to a minimum, used in date order and within expiry date
- Ensuring substances are stored and labelled correctly in accordance with manufacturer's instructions. Appropriate hazard signs should be provided on all storage areas/cupboards where a risk has been identified
- Ensuring that aerosols are not left on window sills or in direct sunlight
- Ensuring correct disposal of substances e.g. hazardous waste, recycling of containers.

### **Personal Protective Equipment and Environmental Protective Equipment**

- Providing Personal Protective Equipment (PPE) to prevent exposure if required. All equipment must be appropriate to the substance and must meet EURO standards. Staff and any others users who may have access to the substance must be trained to clean the equipment efficiently and effectively, if required
- Making sure control measures, e.g. PPE are used correctly and properly maintained, disposed of safely and that safety procedures are followed
- Providing Environmental Protective Equipment (EPE) if required, e.g. drip trays, spill kits
- Ensuring correct disposal of contents of EPE.

## Training

- Ensuring all staff, including temporary staff are aware of the procedures, receive information, instruction and training as required so that they are aware of the risk to health created by their exposure to hazardous substances and the precautions that need to be taken to ensure safe storage and use
- Maintaining a list of COSHH training, including refresher training.
- Maintaining the COSHH Risk Assessment register.

## Health surveillance

- Monitoring exposure to hazardous substance (if required)
- Reporting any work related disease, e.g. dermatitis, occupational asthma on the accident reporting system. Arranging health surveillance as required in conjunction with managers and health and safety staff
- Keeping all health surveillance records for a minimum of 40 years from date of last entry
- Allowing the employee to have access to their health records

## Staff responsibility

All staff are required to follow a safe system of work. This includes:

- Using hazardous substances in accordance with the manufacturer's instructions and COSHH risk assessments
- Familiarising themselves with the relevant COSHH risk assessments, data sheets and relevant policies
- Attending instruction and training in the use of/contact with substances where necessary
- Reporting any health symptoms arising from their work material to the Chairman, e.g. skin irritation, breathing problems
- Using all control measures (i.e. ventilation, PPE) provided in the manner shown in their training or safe systems of work. Following recommended dilution rate and not decanting if possible
- Wearing/storing appropriate PPE if provided, as designed, including carrying out maintenance and cleaning as required
- Reporting any defects in PPE provided to the Chairman
- Assisting in the compilation of risk assessment (where required)
- Making themselves available for any health or medical surveillance deemed necessary in relation to the substances
- Ensuring good standards of hygiene

## COSHH risk assessments

A COSHH assessment is an assessment of risk and control measures to staff and others affected by the substance. The hazard associated with the substance and the way it is being used will decide the level of risk that staff could face. The MSDS will give information about substance hazards; **it is not a replacement for the risk assessment.** Risk assessments must combine the assessor's own professional knowledge and methods of use of the substances in their area.

**For each substance, it is necessary to think about the risks involved. If it is believed that there is no risk, or only a very small one, then no further action is required.**

If a COSHH risk assessment is required, this must be undertaken by a suitably skilled member of the the Management Committee together with someone who is familiar with the systems of work within the area being assessed. The COSHH risk assessment must not just be based on the level of risk

associated with the substance, but must reflect how the substance is used, e.g. the same product diluted is less dangerous than it is when concentrate.

## **Control measures**

An important part of the process of COSHH risk assessment is the identification of effective control measures. All control measures must perform as intended and continue to prevent or adequately control the exposure to substances hazardous to health. If controls are found to be inadequate and therefore could result in reduced efficiency, effectiveness or levels of protection for staff, the following is the preferred hierarchy of control measures which should be considered:

- Elimination – does the substance have to be used? If not, it should be disposed of correctly; if necessary seek advice from supplier
- Substitution – could another (less hazardous) substance be used instead?
- Reduction – can reduced amounts be used?
- Isolation/Enclosure – e.g. redesigning the working environment to contain the substance
- LEV/General Ventilation – e.g. fume cupboard or just opening window and doors to cause natural ventilation
- Safe Systems of Work – staff to be aware of procedures for using substance safely and protecting themselves in normal and emergency circumstances. Safe systems of work may specify the need to limit the length of exposure or just good standards of hygiene housekeeping – e.g. staff to be responsible for putting away substance after use
- Information/Instruction – training where appropriate should be given to staff and others (e.g. contractors, visitors) on the substances, the risks, the methods of control, any PPE, EPE, required and emergency measures
- Supervision – staff may need to be supervised in their work activities to ensure that they are following safe systems of work and are applying the training received
- PPE – this is provided as a last resort because it only protects the individual wearing it. It must be suitable for the task and conditions. It must be regularly inspected with records kept. If PPE is provided it must be worn in the manner it is designed for. A list of PPE provided is required on the risk assessment.

## **Working arrangements**

The Management Committee must ensure that a hazardous substance is not used if an alternative safer product is available. These assessments must be made available and brought to the attention of all relevant staff, so that in the event of an incident, the correct emergency action or first aid measures can be taken.

If the Management Committee is advised that staff are pregnant or have a medical condition whereby they may be affected by hazardous substances, advice on using substances must be sought and included in the risk assessment as the mother or unborn child may be at risk.

## **Emergencies**

In the event of an emergency involving a hazardous substance, the Management Committee must take immediate steps to:

- Make the area safe
- Minimise the effect of the event
- Inform any staff who may be affected
- Restrict access to the affected area to essential personnel only and provide with the necessary PPE until the situation returns to normal

Details of emergency procedures, including a spills procedure, must be documented, communicated to staff, displayed in the workplace. In addition it should be tested, reviewed and revised periodically (as detailed in the monitoring and review section). A log of emergency situations and near misses should be kept at each site.

## **Clinical waste**

This includes all human tissue including blood, whether infected or not, and all related swabs, items used to dispose urine, faeces and other bodily excretions, i.e. bed pan liners, stoma bags, incontinence pads. This waste must be disposed of using the yellow bag system and using an approved carrier and records kept for the last three years.

Care should be taken to avoid accidental puncture wounds by hypodermic needles or other sharp instruments, and ensure the safe disposal of needles by placing them in a 'sharps box'. If no 'sharps box' is available, use a stout container such as a screw lidded jar or sandwich box. This should then be disposed of as hazardous waste. If a cut or puncture wound happens, free bleeding should be encouraged, the affected part washed with soap and running water before being dressed and medical advice sought.

## **Purchasing policy**

All products purchased must be checked before processing to identify if the product requested has COSHH implications. If the product has COSHH implications, the person responsible for ordering materials must then ensure that a MSDS is obtained prior to ordering (not for re-orders). Suppliers of materials are legally bound to supply a MSDS with any new purchase. Supplies of COSHH substances should be kept to a minimum and audited on an annual basis to ensure they are still the most effective but environmentally friendly product for the job. If a definitive list of substances exists for a particular service, e.g. Caretaking and Cleaning, only these products must be used.

## **Disposal / environmental issues**

Substances no longer used must be disposed of in accordance with manufacturer's instructions.

Hazardous waste must be sent to companies that are licensed to carry the waste (a copy of the carrier's licence must be obtained before the first pick up and held on file.) In addition, they must be licensed to handle the waste (a copy of the waste licence must be obtained before the first pick up and held on file.) Waste disposal paperwork received must be held on file and be easily accessible. Paperwork must display the European Waste Catalogue (EWC) six digit code and details of the site. Waste transfer notes for hazardous waste must be held for three years.

Waste should be removed from site on a regular basis to minimise storage of flammable materials. A discharge agreement, in the form of a licence or small volume letter (SVL), is also required from the local water authority for any 'trade effluent' discharge to sewer. Only clean rainwater should be allowed to enter the storm drain.

## **Monitoring and review**

It is the responsibility of the Management Committee to ensure that the risk assessments are undertaken and the assessments are kept up to date and reviewed:

- when there has been a change in work procedure
- if the substance is used for a different task
- if a substance has changed, e.g. new MSDS received
- upon HSE direction
- following any adverse incident involving the substance or task.








COSHH Risk Assessments must be kept for three years and must be available for inspection as part of annual inspections and audits.

The Management Committee will monitor and review this policy on a three yearly basis in order to ensure ongoing compliance with legislation and effective operational practice, or earlier if conditions change or there is a change in statutory demands.



## Appendix 1 - Labelling for Hazardous substances pre 2009 (CHIP Regulation)

The table below illustrates the original seven hazard symbols and their meanings. Two of the symbols were used to denote more than one hazard with the actual chemical hazard being listed on the label/container/MSDS. The CHIP Regulations were revoked in 2015, and manufacturers were required to fully adopt the symbols found in Appendix 2 from that date

Symbol	Abbreviation	Hazard(s) the Symbol is used to Indicate
	T+ T Carc Cat 1 & 2 Muta Cat 1 & 2 Repr Cat 1 & 2	Very toxic Toxic May cause or increase incidence of cancer Induce or increase incidence of heritable genetic defects Produce or increase the incidence of non-heritable effects in offspring and/or impair reproductive capacity
	N	Dangerous for the Environment
		Bio-hazard
	F+ F	Extremely Flammable Highly Flammable / Flammable
	Xn Xi Carc Cat 3 Muta Cat 3 Repr Cat 3	Harmful (may cause damage to health) Irritant Category 3 Carcinogens, Mutagens and Reproductive Toxins – suspected as such but insufficient evidence to meet a higher category.
	O	Oxidising
	C	Corrosive



## Appendix 2 - Labelling for Hazardous substances since 2009 (CLP Regulation)

### Classification, Labelling and Packaging of Substances and Mixtures. Adoption within the EU of the Globally Harmonised System

#### Summary

Since December 2010, international symbols replaced the European symbols.







This new UN Globally Harmonised System aimed to make all classification etc of substances standardized the world over to reduce confusion and aid risk reduction measures.

#### Background

This system was implemented in the EU by the **Classification, Labelling and Packaging of Substances and Mixtures Regulation (CLP Regulation)** which came into effect 20 January 2009, and was subject to a lengthy transitional period. Prior to this harmonisation, substances and preparations were classified, labelled and packaged according to the **Chemicals (Hazard Information and Packaging for Supply) Regulations 2009 (CHIP)**.

#### Pictograms

There are 9 pictograms, all a white background with a red diamond frame with the black hazard symbol inside. All pictograms relating to transport are still governed by the Transport of Dangerous Goods Regulations.

Description	Old Pictogram	New Pictogram	Hazard class and hazard category:
Exploding Bomb			Unstable explosives Explosives of Divisions 1.1, 1.2, 1.3, 1.4 Self reactive substances and mixtures, Types A,B Organic peroxides, Types A,B
Flame			Flammable gases, category 1 Flammable aerosols, categories 1,2 Flammable liquids, categories 1,2,3 Flammable solids, categories 1,2 Self-reactive substances and mixtures, Types B,C,D,E,F Pyrophoric liquids, category 1 Pyrophoric solids, category 1 Self-heating substances and mixtures, categories 1,2 Substances and mixtures, which in contact with water, emit flammable gases, categories 1,2,3 Organic peroxides, Types B,C,D,E,F
Flame Over Circle			Oxidizing gases, category 1 Oxidizing liquids, categories 1,2,3

## Gas Cylinder



Gases under pressure:  
- Compressed gases  
- Liquefied gases  
- Refrigerated liquefied gases  
- Dissolved gases

## Corrosion



Corrosive to metals, category 1  
Skin corrosion, categories 1A,1B,1C  
Serious eye damage, category 1

## Skull and Crossbones



Acute toxicity (oral, dermal, inhalation), categories 1,2,3

## Exclamation Mark



Acute toxicity (oral, dermal, inhalation), category 4  
Skin irritation, category 2  
Eye irritation, category 2  
Skin sensitisation, category 1  
Specific Target Organ Toxicity – Single exposure, category 3

## Health Hazard



Respiratory sensitization, category 1  
Germ cell mutagenicity, categories 1A,1B,2  
Carcinogenicity, categories 1A,1B,2  
Reproductive toxicity, categories 1A,1B,2  
Specific Target Organ Toxicity – Single exposure, categories 1,2  
Specific Target Organ Toxicity – Repeated exposure, categories 1,2



Aspiration Hazard, category 1

## Environment



Hazardous to the aquatic environment  
- Acute hazard, category 1  
- Chronic hazard, categories 1,2

## Hazard statements

There are standard statements about the nature of hazard and degree of hazard of the substance. Each hazard statement has a corresponding identification code, however this may not be used instead of the written hazard statement on the packaging/safety data sheet and must only be used for reference.

## Precautionary statements

There is a brief statement to provide measures to undertake to minimise or prevent effects from physical, health or environmental hazards. These include first aid measures and can be a pictogram (see above) or a written statement.

## Safety Data Sheets

1. Identification
2. Hazard(s) identification
3. Composition/information on ingredients
4. First-aid measures
5. Fire-fighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information

Guidance states that all containers should maintain the suppliers' label. However, if you decant into smaller containers and these should be labelled with the pictograms and warning statements unless they are too small to usefully hold the information required. This information can be published in another manner deemed suitable, for example on a poster next to the cabinet in which the container is kept. It is suggested that a poster should in any case be kept near to chemical storage