

Hazardous Substances Policy			
Policy✓	Code of Practice...	Guidance...	Procedure...
Organisation-wide✓		Local...	
Approved by the University Health & Safety Committee			
Chairman	Eliot Glover	Date	29 th November 2021
			Review date 2024
The purpose of presenting this documents to the University Health and Safety Committee			
Standard 3 year re-fresh✓		Changes in practice and/or legislation...	New Policy...

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1. Introduction

The Control of Substances Hazardous to Health Regulations is designed to protect people and the environment from risks arising from exposure to substances at work. The University will assess and adequately control the risks created by the use, storage, transport and disposal of hazardous substances.

2. Scope

This policy shall apply to the University as a whole. Subject-specific regulations impose additional requirements in respect of asbestos, lead, radioactive materials, and picric acid on which separate guidance should be obtained from the Health, Safety and Environment Team.

The EU CLP Regulation as amended, is retained in GB law. These arrangements mean that Great Britain continues to adopt GHS, independently of the European Union.

In order for GB CLP to operate fully and effectively in Great Britain, the EU CLP Regulation has been amended. This means there are changes to the requirements or allowances in existing processes and procedures. Further information can be found here: [Chemical classification: The GB CLP Regulation \(hse.gov.uk\)](https://www.hse.gov.uk/chemical-classification-the-gb-clp-regulation/)

3. Responsibilities

3.1 Health, Safety and Environment Team

The Health, Safety and Environment Team (HSET) is responsible for auditing compliance with the policy across the university. This includes auditing the procedures in place for the procurement, use, storage and disposal of hazardous substances. The HSET is also responsible for the provision of advice, training and guidance to the University on compliance with this policy, and for liaising with the regulatory authorities.

3.2 Executive Team Members (Deans, Directors, COO or equivalent)

Executive Team Members are responsible for implementation of this Policy and ensuring that:

- Hazardous substances used in their areas of responsibility are assessed prior to use and that exposure to any substance is prevented or, where this is not reasonably practicable, adequately controlled. They must also ensure that the control measures adopted within their areas of responsibility are serviced and maintained;
- Staff and students are provided with sufficient instruction and information and are adequately trained and supervised;
- Practicable and adequate arrangements are made to monitor exposure to hazardous substances; and

- Staff and students who meet the criteria for health surveillance attend for health surveillance and that appropriate records are kept, and any recommendations made by the University Occupational Health Service are implemented.

3.3 Senior Managers reporting to an Executive Team Members (Heads of Department and other Academic/Administrative Units and Service Managers or equivalent)

Senior Managers reporting to an Executive Team Member or equivalent are responsible for;

- Undertaking written risk assessment(s) where hazardous substances or materials are to be used and for the implementation of any control measures identified by the assessment including any advice given by Occupational Health; and for
- Ensuring that work is only undertaken where a risk assessment has been undertaken and where adequate information, instruction, training and supervision have been provided.

3.4 Employees and Research staff and Students

Employees, research staff and students shall:

- Comply with the appropriate risk assessment and any supplementary guidance and use any protective equipment provided in the appropriate manner;
- Report any defects in the procedure, protective equipment or plant to their manager/supervisor; and
- Undertake any training and health surveillance deemed necessary.

3.5 Contractors and limited companies

Where another employer or self-employed person is involved in shared premises or in the use of contractors (including employees from other Colleges within the University), appropriate measures must be taken and communicated to those affected by the relationship to ensure full cooperation and coordination is taking place that ensures that responsibilities are defined and all risks properly addressed.

Additional specific requirements apply in relation to fumigations and to work with carcinogens, micro-organisms and all other biological materials, on each of which separate guidance should be obtained from the University's Health, Safety and Environment Officer (healthandsafety@brunel.ac.uk).

4. Risk Assessment

Regulation 6 of the COSHH Regulations requires that no work is carried out which is liable to expose any employee to any substance hazardous to health unless a suitable and sufficient risk assessment has first been carried out and appropriate control measures have been implemented.

The University's COSHH assessment form may be used to assist with the development of appropriate risk assessments and it is attached as Appendix 1 to this document. This form will apply to all activities at the University, but some cases may require a variation to the Form in Appendix 1. This is acceptable on the provision that the Health, Safety and Environment Team has been consulted and approved the variation. Material Safety Data sheets used to inform the development of COSHH assessments should be retained locally either electronically or in paper format.

The decanting of chemical substances from their original containers is discouraged. Where this is necessary, containers must be clearly marked and labelled with the manufacturer's instructions for use. The label should clearly identify the hazards of the substance.

5. Organisational Development

For those who undertake work and/or study liable to expose them to a substance hazardous to health, the University is required to provide suitable and sufficient information, instruction and training. Workshops are available that are designed to meet the need to inform and train those who undertake work on with substances hazardous to health and are available through Organisational Development.

6 Control Measures

Deans of Colleges, Directors of Institutes and Directors must in particular ensure that all engineering controls, including fume cupboards and other forms of local exhaust ventilation are subject to appropriate regimes of maintenance, examination and testing. Fume cupboard and LEV failure must be reported to Estates Maintenance immediately and the items labelled not to be used.

Respiratory protective equipment [RPE] shall where possible, be of the disposable type and used in accordance with manufacturer's instructions and guidance. Non-disposable RPE must be thoroughly examined and, if necessary, tested at specified intervals by purpose-trained staff appointed within the area concerned. Any ongoing difficulty with a control measure should be referred to the Health, Safety and Environment Team. All staff using respiratory protective equipment must undergo a [face-fit test](#).

7. Assessment Development, Review and Records

Risk assessment findings must be recorded and all staff or students informed of both the risk and the risk mitigation procedures. Assessments should be reviewed regularly (at least yearly) - and at once in event of significant change in circumstances (substance, equipment, etc.) or other indication that an assessment is no longer valid.

Assessments should similarly be reviewed in light of relevant accident reports, monitoring results or other indication that controls are inadequate. Where assessment review indicates a need for additional control measures, those controls must be implemented before work continues with the substance(s) concerned. Colleges/Institutes should keep maintenance and training records and copies of current, and superseded assessments for at least five years after cessation of the activity concerned.

8. Accident and Emergency

All accidents involving substances, including any defects in control measures, should be reported as described in the Accident Reporting and Investigation Policy. Emergency Evacuations of buildings must not be delayed to close experiments down unless closing down is essential for safety and can be done in safety.

9 Managing Historical Chemical Waste

Bulk purchasing of chemicals or hazardous materials should be discouraged and approved only on a case-by-case basis where a justification for the purchase is provided. Regular assessment of volumes of chemicals and/or hazardous materials should be undertaken to ensure that out of date or obsolete stocks are disposed of appropriately.

University procedures in relation to the disposal of Hazardous wastes should be followed at all times.

COSHH Assessment Form



HAZARD IDENTIFICATION & COSHH	
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Description of activity/procedure/experiment:

Name:	Signature:	Date:
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Substance	HAZARDS										EXPOSURE ROUTE			CONTROL Method					DISPOSAL METHOD								
	Explosive	Oxidising	Flammable	Toxic	Carcinogenic	Mutagenic	Reproductive effects	Harmful	Corrosive	Irritant	Other Dangerous to the	Inhalation	Ingestion	Absorption through skin	Absorption through eyes	Goggles	Face Shield	Gloves	Respiratory Apparatus	Lab coat	Fume Cupboard	Sink	Solvent Waste	Contractor	Waste	Other	

Outline the emergency plan, spillage or uncontrolled release procedures:

COSHH Assessment Form



Comments on waste / disposal:

Health Surveillance requirements:

Restrictions on use please tick if applicable:

Work not to be done outside normal working hours

work to be done by named persons only(specify)

Work not to be left unattended

work to be done in restricted areas (specify area)

If work overnight please complete the overnight form

Sources of Information: List the safety data sheets and other relevant material

Risk Assessment: Has a thorough Risk Assessment been completed for each activity - ***Yes/No** (**delete as appropriate*)