

COSHH POLICY



Policy Statement

SCCS Survey Equipment Limited strives to promote Health, Safety and Welfare, achieved through the management of Health & Safety in accordance with current legislation and approved codes of practice.

The Control of Substances Hazardous to Health Regulations (COSHH) 2002 requires employers to assess health risks which may arise from exposure to hazardous substances in the workplace and to prevent these when possible. As part of this assessment, employers must establish what measures are necessary to prevent or adequately control exposure to substances hazardous to health and what further precautions and emergency procedures need to be taken to protect the health of employees, as well as anyone not in its employment who may be affected by its activities or omissions.

Measures will be implemented to protect Health, Safety and Welfare of all personnel regardless of the location, where they may be engaged on duties in the course of their employment.

Policy Aims & Commitments

Company Commitments

1. Protection of SCCS personnel.
2. Protection of Contractors and Visitors to SCCS premises.
3. Protection of the environment.
4. Compliance with all requirements of UK Health & Safety Legislation.

Policy Aims

1. This policy aims to set out the measures required to establish that all reasonable steps will be taken to ensure that all exposure of employees, contractors, and visitors to substances hazardous to health is prevented or at least controlled to within statutory limits.
2. This policy aims to provide information and guidance on arrangements for the control of risks associated with hazardous substances used at work to ensure legal compliance with The Control of Substances Hazardous to Health.
3. This policy aims to increase employee awareness of the issues & risks attached to working with hazardous substances thus encouraging safe practices. All employees should know what to do in the event of an emergency, such as a spillage.

Scope

This policy applies to all SCCS employees and other persons working on behalf of SCCS, that use substances or mixtures classified as dangerous to health during their working day, within our own premises or those of our clients.

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Policy Reference:	014.1.2023.PL
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Approved by:	Kevin Smith

Definitions

“The Company” shall mean SCCS Survey Equipment Limited

“HSWA” shall refer to The Health & Safety at Work Act 1974

“MHSW” shall refer to The Management of Health & Safety at Work Regulations 1999

“COSHH” shall refer to The Control of Substances Hazardous to Health Regulations 2002

“CLP” shall mean Classification, Labelling and Packaging

“SDS” shall mean Safety Data Sheet

“GHS” shall mean Globally Harmonised System of Classification and Labelling of Chemicals

“WELs” shall mean Workplace Exposure Limits

“PPE” shall mean Personal Protective Equipment

“Competent person” shall mean someone who has sufficient training and experience or knowledge and other qualities that allow them to assist properly.

1. Legal Requirements Applicable

1. The Health & Safety at Work Act 1974
2. The Management of Health & Safety at Work Regulations 1999
3. The Control of Substances Hazardous to Health Regulations 2002
4. Personal Protective Equipment at Work Regulations 1992 as amended 2022

2. Responsibilities and Duties

Managing Director

The Managing Director has overall responsibility for the management of the Company’s Safety Management Systems. This includes the compliance with various legal provisions of The Health & Safety at Work Act 1974 and all subsequent regulations. The day-to-day responsibility for coordinating the Company Safety Management System shall be delegated by the Managing Director as appropriate.

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Health & Safety Manager

Responsibilities are:

- Collate all information required to identify hazardous substances
- Ensure that suitable and sufficient risk assessments are conducted for all substances identified as hazardous
- Responsible for recording and updating the COSHH register
- Ensuring that information is available for employees regarding instruction, control measures and training before using any hazardous substances
- Communicating this policy to all employees and liaising with Line Managers to effectively implement this Policy
- Providing advice to Line Managers on health & safety issues arising from work with substances hazardous to health
- Carry out or arrange appropriate exposure monitoring when required
- Arrange planned preventative is carried out for control measures used
- Ensure spill kits are available that relate to the type of 'spillage' that could occur
- Liaise with HR when health surveillance is required

Line Managers

Responsibilities are:

- Monitoring/supervising employees to ensure they follow safe systems of work and follow procedures that are implemented
- Ensuring that all employees for which they are responsible who are undertaking tasks involving substances hazardous to health are made aware of and are familiar with procedures and measures contained within risk assessments relevant to the work being undertaken and have all the appropriate training
- Ensuring chemicals and hazardous substances are stored in suitable storage areas
- Provide protective personal equipment and clothing (free of charge) when using and handling substances that are hazardous to health

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Employees

Responsibilities are:

- All employees have a duty to take reasonable care for themselves and others as required by The Health & Safety at Work Act 1974; this duty extends to the safe use of substances hazardous to health
- Before any substance is used, all employees are responsible for reading the related risk assessment and accompanying SDS to familiarise themselves with the risks, control measures and what to do in an emergency
- Make full and proper use of all engineering controls or systems of work provided or developed by the employer
- Use hazardous substances in accordance with the manufacturer's instructions and COSHH risk assessments including safe storage to prevent unauthorised use
- Inform the Health & Safety Manager of the purchase of any new substance not on the COSHH register. Employees are NOT authorised to use any substance until a full risk assessment has been conducted.
- At point of purchase, ensure that the current Safety Data Sheet has been obtained for the substance
- Report any health symptoms arising from their work immediately to their Line Manager e.g.- skin irritation, breathing problems
- Attend any health checks/surveillance arranged with Occupational Health
- Inform the Health & Safety Manager if you feel you are at an increased risk (such as, but not limited to, medical conditions, pregnant workers, under 18)

Contractors

Contractors must provide the company with copies of their risk assessments for hazardous substances intended for use on the premises

Suppliers

Suppliers must provide suitable and sufficient information by way of Safety Data Sheets and any other relevant information in connection with materials and substances supplied for use by the company

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3. COSHH Process

Using chemicals or other hazardous substances at work put people's health at risk, so law requires employers to control exposure to hazardous substances to prevent ill health. SCCS are committed to protect both employees and others who may be exposed by complying with the Control of Substances Hazardous to Health Regulations 2002.

To comply with the requirements of the COSHH Regulations the company must:

- Carry out risk assessments
- Prevent or control exposure to hazardous substances
- Identify and select suitable control measures
- Provide information and training in the use of controls
- Ensure that there are arrangements to deal with accidents and emergencies
- Carry out monitoring where required
- Carry out health surveillance where appropriate

4. COSHH Risk Assessment

A COSHH Risk Assessment **must be** carried out for all hazardous substances used or generated by the work activity of the company. A COSHH Assessment should identify the hazards and risks associated with the use of substances. It will also contain details of precautions to be taken to control the risks associated with their use. The COSHH risk assessment together with the Safety Data Sheet will be retained electronically in the COSHH folder on the companies shared drive. Risk assessment will receive top-down management endorsement.

4.1 Identification of Hazardous Substances

A hazardous substance is a substance that has the potential to cause harm if inhaled, ingested, injected, or absorbed through the skin or released into the environment. Hazardous substances occur in the following forms from a packaged item, work process or waste:

- Substances or a mixture of substances that have GHS warning symbols on the packaging or within the Safety Data Sheets
- Substances with Workplace Exposure Limits (WELs)
- Biological agents (bacteria, viruses, and other micro-organisms)
- Any kind of dust in a specific concentration

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Globally Harmonised System of Classification and Labelling of Chemicals



4.2 Decide who might be harmed and how

- Consider who might be exposed to the substance and for how long. This will include employees working directly with the substance, employees working in the area as well as contractors and visitors
- Examine work activities to identify what substances employees may be exposed to, how often and for how long
- A separate risk assessment should be conducted for those who may be at increased risk, such as pregnant workers, young people under the age of 18 and those with increased susceptibility due to allergies or health conditions. E.G Asthma or dermatitis

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4.3 Prevent or control exposure

The Company will follow HSE recommended hierarchy of controls:

- **Elimination/removal** – changing the process or activity so that the hazardous substance is not needed or generated
- **Substitution** -replace with a safer alternative; use it in a safer form, e.g. solid instead of powder to avoid dust; Irritant cleaning product for something milder
- **Control options**
- **Information, Instruction and training**
- **Surveillance** (if appropriate)
- **Personal protective equipment**

COSHH Regulations require **Elimination** and **Substitution** to be the primary controls for the reduction of risk due to exposure to hazardous substances, or where this is not reasonably practicable, other adequate controls of exposure need to be considered.

Control options

Control measures should be appropriate to the activity and consistent with the risk assessment, and may include, in order of priority, one or more of the following:

- **Reduction** – change the process to emit less of the substance for example, reduce the amount of time spent using the substance
- **Isolation/enclosure** – separate workers from the hazard and/or enclose the process
- **Extract or ventilate** – use local exhaust ventilation (LEV), general ventilation i.e doors/windows
- **Have as few workers in harm's way** as possible
- **Safe systems of work** – reduce the amounts used and the amount of products stored in the workplace

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Information, Instruction and Training

The company will provide suitable and sufficient information, instruction and training to ensure full understanding of required control measures, for example, provide warning signs where appropriate.

Hygiene procedures where employees need training to ensure they follow the correct procedures and communication of written procedures developed where necessary.

Surveillance

Where required, surveillance may be required to check all elements of control measures for their continuing effectiveness.

Personal Protective Equipment (PPE)

PPE should always be considered as the last line of defence and should be used when all other measures are inadequate to control exposure. PPE does not remove the hazard.

PPE is reliant on being worn and used correctly by the individual. It protects only the wearer, while being worn. If it fails, PPE offers no protection at all.

PPE includes any or all equipment (including weather protection) intended to be worn or held by a person at work and which protects that person against one or more risks to their health & safety.

All PPE will be provided free of charge with no costs incurred by the employee.

For further information with respect to PPE, please refer to **SCCS PPE Policy 014.7.2014.PL**

4.4 Reviewing COSHH Risk Assessments

All Risk Assessment must be reviewed at appropriate interval and depending on circumstance. The following definitions define appropriate trigger points for the review of Risk Assessment:

- Not less than annual review.
- A person affected by the process becomes vulnerable (pregnancy, particular illness or similar which enhances the risk to that individual).
- A change to premises (where a process is carried out).
- Introduction of new personnel to a process.
- Introduction of new tooling or equipment or new working practices
- Introduction of new substances.
- Introduction of new legislation.

This list should be considered an inclusive but not exhaustive list of trigger points.

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5. The Use, Maintenance, Examination and Test of Control Measures

When personal protective equipment (PPE) has been assessed as necessary, it must be provided free of charge and suitable for purpose.

A record of issue should be signed by the recipient and kept in the COSHH folder on the shared drive.

The Company shall hold a PPE register where all newly issued PPE will be recorded.

Checks are to be carried out prior to purchase of PPE to ensure they are 'CE/UKCA' marked and comply with the requirements of the Personal Protective Equipment at Work Regulations 1992 (as amended 2022).

The regulation states:

"Every employer shall ensure that any personal protective equipment provided to their workers is maintained (including replaced or cleaned as appropriate) in an efficient state, in efficient working order and in good repair"

The regulation also require that PPE is:

- Properly assessed before use to make sure it is fit for purpose
- Maintained and stored properly
- Provided with instructions on how to use safely
- Used correctly by employees

Further details on selection, use and maintenance of Personal Protective Equipment can be found in the **SCCS Personal Protective Equipment Policy 014.7.2014.PL** and the Health & Safety Executive (HSE) brief guide to PPE at work <http://www/hse.gov.uk/pubns/indg174.pdf>

Where control measures such as Local Exhaust **Ventilation** (LEV) are introduced, they must be maintained in efficient working order and tested once every 14 months at a minimum.

Records of all such maintenance, examination and testing should be kept for 10 years and 8 months under the Consumer Protection Act 1987

All maintenance and testing should be carried out by a competent person. This will be arranged by the Facilities Manager.

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6. Monitoring Exposure at the Workplace

Exposure monitoring is a means of establishing what concentration of hazardous substance a member of staff may be exposed to whilst performing a work activity using that substance. It can also be used to determine how well the control measures are working.

Monitoring normally means air sampling but it may also involve taking biological samples, e.g. breath, or urine.

If the Safety Data Sheet (SDS) lists a Workplace Exposure Limit (WELs) or a WEL is specified within the HSE EH40 document <http://www.hse.gov.uk/pubns/priced/eh40.pdf> the company is responsible to ensure the WEL is NOT exceeded.

Examples of **immediate** indicators where exposure is likely to constitute a risk to health and require investigation are:

- evidence of fine dust deposits on people or surfaces
- fumes or particles visible in the air (e.g. in light beams)
- excessive build-up of an unexplained odour.

Anyone appointed to carry out monitoring must be suitably trained and competent in monitoring techniques. Membership of the British Occupational Hygiene Society (BOHS) is an indicator of suitable training in monitoring techniques.

Records of monitoring must be kept for a minimum of 40 years.

7. Health Surveillance

Health surveillance is a scheme of repeated health checks which are used to identify ill health caused by work. Health and safety law requires health surveillance when your workers remain exposed to health risks even after you have put controls in place.

Routine surveillance of individuals' health must be undertaken when it is warranted by the degree of exposure and the nature of the effects in order to detect any adverse health effects at an early stage. This will allow action to be taken to prevent more serious disease from developing.

Health surveillance may be self-examination; Line Manager examination; or through a nominated GP.

Records of Health Surveillance must be kept for a minimum of 40 years.

Health Surveillance records fall under the remit of GDPR regulations.

All Subject Access Requests (SAR) must be requested in accordance with the **SCCS GDPR Policy 011.4.2021.PL** as detailed in Section 8.

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8. Arrangements for dealing with incidents, emergencies, and spillages

The COSHH Risk Assessment and SDS will provide information about suitable first aid responses for contact with the substance, any fire hazards and firefighting measures and how to deal with an emergency situation, such as a spillage.

There must be pre-planning and procedures put in place to deal with any COSHH incidents which should reflect the level of risk, including familiarisation of locations of spill kits, availability of PPE for dealing with a COSHH incident and arrangements for calling the emergency services.

9. Procurement of Hazardous Substances

All COSHH substances are logged on a maintained COSHH register, prior to the procurement of Hazardous substances the following steps must be taken:

- Liaise with appropriate Managers with regards to the requirements/business case relating to the purchase of products that fall within the scope of COSHH, establishing the organisational needs for the product
- Establish if a product is hazardous and investigate the availability of a less hazardous alternative product if available
- Ensure that the appropriate manufacturers' Safety Data Sheet (SDS) are obtained from suppliers prior to purchasing and forward to the Health & Safety Manager
- Inform the Health & Safety Manger of the purchase of any new substance not on the COSHH register. Employees are **NOT** authorised to use any substance until a full risk assessment has been conducted.

10. Information, Instruction and Training for Employees

All employees tasked with working with hazardous substances should be appropriately trained and competent to carry out the task in a safe and proper manner.

In particular, the instruction must be sufficient and suitable for them to know

- how and when to use the control measures as per assessed within the COSHH assessment
- the defined methods of work
- how to use the personal protective equipment and especially respiratory protective equipment

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- the cleaning, storage, and disposal procedures they should follow, why they are required and when they are to be carried out,
- the procedures to be followed in an emergency

Training in the use and application of control measures and PPE should take account of recommendations and instructions identified within the COSHH assessment and any data supplied by the manufacturer.

Records of training given to individual employees or specific groups of named employees to be kept locally for 5 years.

11. Compliance & Review

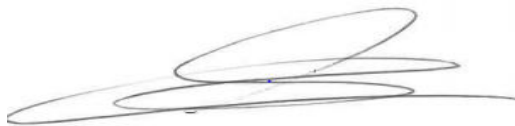
Overall responsibility for implementation of this policy rests with the Management Team.

All SCCS personnel are responsible for ensuring they comply with the remit of this policy and flag up any concerns appropriately with the Management Team for resolution.

This policy will be reviewed at least annually, and any appropriate action taken accordingly.

Changes to policy will be communicated to affected personnel.

Signed:



Print name: Kevin Smith

Position: Managing Director

Revision No: 1

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Next review: 20.03.2024