

## COSHH RISK ASSESSMENT POLICY

### Policy Statement:

**Risk assessment and control of hazardous substances:** Fatality and illness caused by exposure to hazardous substances - which include pure chemicals, chemical preparations, toxic wastes and biological materials, etc - are among the most serious concerns of health-and-safety management.

The types of health effect that can be caused by hazardous substances include asthma, skin irritation and dermatitis, infection, cancer, loss of consciousness, and many other more-subtle consequences. Many of these health effects are instant (acute - for example, poisoning by cyanide, or corrosive burns with acid) but some are delayed over long periods of time (chronic - for example, chemicals that induce cancers).

Because of this, it is essential to have a risk-management strategy to eliminate or control exposure, at least within the guidelines required by current legislation and scientific knowledge.

**Regulation of workplace hazardous substances:** Specific legislation on this topic is the 'Control of substances hazardous to health regulations 2002' - the so-called 'COSHH Regulations'.

The COSHH Regulations require employers to eliminate or control exposure to hazardous substances in the workplace in order to protect employees and others who may be exposed from work activities. They also include requirements such as health surveillance and medical record-keeping of those exposed to some categories of hazardous substances.

Due to the wide range of substances, circumstances and uncertain harmful effects, COSHH requires these risks to be managed without making duties for particular circumstances, such as may be found in a laboratory, or a foundry. Instead it sets out a generic system for managing substance risks as found in individual workplaces.

The principles are similar to most management techniques, and involve:

- ✚ determining the situation
- ✚ deciding what to do about it
- ✚ implementing an action plan
- ✚ monitoring performance
- ✚ reviewing the plan to seek constant improvement.

One of the main aims of COSHH is to match precautions to the level of risk involved. The COSHH assessment is tailored to suit the circumstances of each case. Complex cases require more detailed, scientific consideration than simpler, low-risk situations.

**All Employees:** This policy applies to all persons working for or on our behalf of the McSence Group of Companies which includes the subsidiary companies - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd* in any capacity including but not limited to:

- ✚ All employees at all levels, prospective employees, agency workers, seconded workers, temporary workers, contractors/sub-contractors, clients, agents, external consultants, volunteers, members of the public, group's supply chain, third-party representatives and/or business partners who will be referred to in our Group policies as "all employees".

**The Workplace:** This policy applies to all persons working for or on our behalf of the McSence Group of Companies in any capacity at the workplace(s) as defined below which includes but not limited to:

- ✦ McSence Premises, Offices, Units, Business Park, Client's Premises, External Meeting Places, Customers' Homes, Gardens, Sheltered Housing, Whilst On-Call, On-Duty, Emergency Cover, Working from Home including On-Line Meetings, Whilst Driving in Company Time, Working Public Areas (café's, trains, coffee shops, buses etc) and will be referred to throughout this policy as "the workplace".

### How COSHH relates to other health-and-safety legislation

There is a general requirement in the 'Management of health and safety at work regulations 1999' that employers must assess every work activity to detect and evaluate any risks to employees, and anyone else who might be affected by the work. This is a duty shared with COSHH, except the latter offers more details of what is required so far as hazardous substances are concerned.

Chemical substances available for sale in the EU are classified according to their hazard by the 'Chemicals (hazard information and packaging) regulations 2002' (the 'CHIP Regulations'). These substances are labelled so that end-users can easily identify which require special attention. In addition, the CHIP Regulations require that work-related users are given safety data sheets setting out the hazards and controls in a standard format.

Particularly-hazardous substances have been assigned exposure limits, and these are listed in the Health and Safety Commission's annually-revised document EH40 'Occupational exposure limits'.

COSHH covers the following hazardous substances:

- ✦ substances/mixtures of substances classified as dangerous to health under the CHIP Regulations
- ✦ substances with occupational exposure limits - MELs and OESs
- ✦ biological agents - bacteria and other micro-organisms
- ✦ dust of any kind, when present above certain concentrations in air
- ✦ any other substance which creates a hazard to the health of any person; eg, pesticides.

COSHH does not deal with lead or asbestos. These substances are covered by the 'Control of asbestos at work regulations 2002' and the 'Control of lead at work regulations 2002'. Both are specialist areas of work, and are not dealt with here.

COSHH does not apply to drugs, or substances whose hazard is due to their explosive, radioactive, flammable, temperature (high or low), or high-pressure characteristics. These all have specific regulations dealing them, which are covered elsewhere in this service. Neither does COSHH apply to non-toxic asphyxiant gases (such as halon or carbon-dioxide) where general risk assessment will be sufficient to assess and control the hazard.

### Complying with COSHH

COSHH requires employers to assess the risks to the health of employees from exposure to hazardous substances, and to eliminate, or where this is not reasonably practicable, adequately control exposure.

#### Employers

To comply with COSHH, employers must follow seven basic steps:

- ✦ identify and assess the risks (to health) due to using hazardous substances in your workplace
- ✦ decide what precautions are needed
- ✦ prevent or adequately control exposure
- ✦ ensure controls are used and maintained
- ✦ monitor exposure
- ✦ carry out health surveillance, if appropriate
- ✦ ensure employees are properly informed, trained and supervised.

The essential point is that employers must not carry out work liable to expose employees to any hazardous substance unless a risk assessment has been completed and adequate controls are in place to meet the requirements of the Regulations. The risk assessments should be reviewed when:

- ✚ there is reason to suspect that the assessment is no longer valid (for example, if new information is available about the substance); or
- ✚ there been a significant change in the assessed work (for example, if longer hours are worked with the substance, or it is put to a new or different use).

**Employees:** Employees must:

- ✚ co-operate with employers to enable them to meet their obligations (for example, by attending training courses)
- ✚ make full and proper use of control measures (for example, by using personal protective equipment, local exhaust ventilation systems, etc)
- ✚ report any defects in work or protective equipment
- ✚ attend any medical examinations and provide health information as may be reasonably be required by the employer's physician or occupational health nurse.

**COSHH risk assessment:** The law requires employers to carry out a 'suitable and sufficient' assessment. This involves:

- ✚ identifying all the hazardous substances in use in the workplace
- ✚ ascertaining how much/often hazardous substances are used
- ✚ what exposure there is
- ✚ determining the risks to human health
- ✚ deciding what action is needed to eliminate exposure or reduce it so far as is reasonably practicable.

The complexity of an assessment will depend on the process undertaken, the hazards involved and who may be affected.

Employees must be involved in the assessment process. They know how the work is actually carried out - including short-cuts to written procedures. This involvement promotes ownership of precautions identified by the assessment.

Employee participation can be on an individual or representative basis. Employers must consult employees on arrangements for measures to ensure their health and safety, and on checking the effectiveness of those measures. This includes consultation on the matters covered by COSHH.

**Competence**

Employers may carry out the risk assessments themselves, delegate to others, or call in external expertise. The decision will depend on the knowledge and experience needed for the particular job.

People carrying out assessments must be given facilities and authority to do the work competently. They need time and status to gather the information, talk to the appropriate people, and examine records and the workplace. A number of people may be assigned different assessment tasks.

Where the expertise does not exist 'in-house', then outside specialists may be required to enable the work to be done competently, quickly and to a high standard.

**Essential skills for a COSHH risk assessor**

Assessors must have an understanding of the requirements of COSHH and associated HSC 'Approved codes of practice' and 'Guidance'. This will ensure that they:

- ✚ are able to gather information systematically about exposures and risks
- ✚ can appreciate the significance of what they observe, particularly if it diverges from recognised procedure
- ✚ can predict possible departure from observed practice and understand the significance
- ✚ are able to undertake simple diagnostic tests
- ✚ can identify, find and review relevant technical information
- ✚ can draw information together in a systematic way, to estimate risks and consequences
- ✚ can form valid and justifiable conclusions about exposures and risks.

Assessors must be able to specify the steps needed as well as understanding their own limitations. They must also be able to communicate their findings about the risks and precautions to the employer and to other people who need to know, whether the report is oral or written.

## Engaging consultants

Before opting for a consultant, employers should be certain that they cannot do the work for themselves. This will ensure valuable expertise and knowledge is retained within the organisation.

If you engage a consultant make sure you:

- ✚ both know what the consultant is employed to do
- ✚ work with them rather than leaving them to do the task in isolation
- ✚ obtain a comprehensive written report, with clear conclusions
- ✚ act on their recommendations - even if it is to reject them.

## Collection of information

Sources of information on substance usage include complaints, report findings, accident investigations, inventories and employees.

## Identification of hazardous substances

If your business uses or creates gases, vapours, liquids, fumes, dusts and solids, or a mixture of materials and micro-organisms, then you will need to make a COSHH assessment. Do not forget to include waste materials - 'special wastes' also must be considered under COSHH.

Firstly, make a list of all hazardous substances. The list may be quite large as it will need to cover all substances:

- ✚ that come into the company
- ✚ that are produced during any process, or are a by-product of any process, (wastes, residues, fumes, or dusts)
- ✚ transported, collected, poured, weighed, packed, disposed of, or discharged
- ✚ used in, or arising from maintenance, cleaning, repair work, research, testing, building maintenance including insulating and blast-cleaning materials, etc.

Hazardous substances are recognised by reading or checking:

- ✚ the product label - hazardous substances are (generally) marked with one or more of the standard hazard symbols
- ✚ information provided by suppliers, who must provide you with a safety data sheet for each hazardous substance - although they do not have to repeatedly send you these sheets with every order. If you can't understand the product labels and safety data sheets, ask the supplier for help
- ✚ the 'EH40 list' - 'EH40: Occupational exposure limits'. The HSE's list gives occupational exposure standards and maximum exposure limits for each hazardous substance. A new edition is published each year
- ✚ Schedule 10 of the COSHH Regulations, where carcinogens are listed
- ✚ HSE guidance notes, trade association and technical literature
- ✚ knowledge and experience of the process within your organisation.

## COSHH RISK ASSESSMENT PROCEDURES

### 1. PURPOSE:

- 1.1 This procedure describes how legal compliance with the Control of Substances Hazardous to Health (COSHH) Regulations, the Approved Codes of Practice for the Control of Substances Hazardous to Health, Biological Agents and Carcinogens is met.

### 2. SCOPE:

- 2.1 This procedure is applicable to the McSence Group and their Contractors and Sub-Contractors.
- 2.2 The procedure relates to hazardous substances as they are defined under the COSHH Regulations. Physical hazards such as radiation and noise should be addressed in separate programs.
- 2.3 The procedure references the assessment process documented under United Kingdom Legislation, Approved Codes of Practice and Health and Safety Executive Guidance.

### 3. ACRONYMS:

COSHH	Control of Substances Hazardous to Health.
OEL	Occupational Exposure Limit.
OES	Occupational Exposure Standard.
MEL	Maximum Exposure Limit.
MSDS	Material Safety Data Sheets.

### 4. DEFINITIONS:

#### 4.1 Hazardous Substances:

The Control of Substances Hazardous to Health Regulations states that substances hazardous to health include:

- Substances in part of the Approved Supply List as dangerous for supply within the meaning of the Chemicals (Hazard Information and Packaging for Supply) Regulations;
- Substances with Occupational Exposure Limits;
- A biological agent;
- Dusts of any kind in substantial concentrations; and
- Other substances that may create a hazard to health comparable to those created by the above-mentioned substances.

#### 4.2 Exposure Limits

These are assigned in the UK and form part of the COSHH Regulations

Where no government exposure limit has been defined then the following sources will be investigated and any recommended value adopted; Professional bodies, trade bodies, substance suppliers and reputable publications.

Where no recommended value exists, a value may be defined by an outside Industrial Hygienist based on his or her professional judgement. Where an 8-hour long term exposure limit has been defined by a government agency a 15-minute short term exposure limit, where not defined, may be determined as 3 times the long-term exposure limit value.

Under United Kingdom Legislation Occupational Exposure Limits (OELs) are sub-divided into Maximum Exposure Limits (MELs) and Occupational Exposure Standards (OESs).

For a substance with a MEL adequate inhalation exposure is defined as;

✚ Reduced so far as is reasonably practicable and below the MEL value.

For a substance with an OES adequate inhalation exposure is defined as;

✚ At or below the OES value or above the OES when the reason has been identified and action is being taken to put it right as soon as is reasonably practicable.

#### 4.3 Hierarchy of Control.

In reducing exposure to a hazardous substance controls will be considered in the following priority and applied as to ensure exposure control is adequate.

- i. Elimination of the process or activity giving rise to the exposure.
- ii. Substitution of the hazardous substance.
- iii. Installation of engineering controls.
- iv. Implementation of administrative controls.
- v. Use of personal protective equipment suitable, sufficient and compatible for its use.

Note: Personal protective equipment is considered a last resort and if exposure to carcinogens is determined an effective engineering control must also be used.

#### 4.4 Competency

The identification of hazards and the assessment of risks can only be done by a competent individual.

### 5. PROCEDURE:

#### 5.1 Assessment of Health Risks Created by Work Involving Substances Hazardous to Health.

##### 5.1.1 Assessment Strategy.

Assessment of exposure to hazardous substances will be prioritised.

Highest priority will be given to processes and activities where;

The substance is particularly hazardous, the exposure risk is not fully understood but likely to be significant and there are many people likely to be exposed.

##### 5.1.2 Assessment Process.

Any assessment will be suitable and sufficient. The detail of the assessment will be commensurate to the complexity of the process or activity assessed. The assessment need not be written down if the process or activity assessed is simple and can be readily repeated.

An assessment will consider the hazard, the risk and controls that are in place. It will also consider the emergency procedures in place to deal with leaks, spills or uncontrolled releases. The assessment will state any actions required to adequately control exposure in accordance with the hierarchy of control as defined by the COSHH Regulations.

All new hazardous substances or processes will be subject to a New Substance Approval procedure. This procedure will initiate the assessment process and the completed Substance Approval Form will become the first level assessment. Hard copies of this form will be distributed to relevant persons and also retained in accordance with the procedure.

The New Substance approval procedure will set out the criteria for a more detailed assessment to be completed. If the criteria are met a second level assessment will be carried out. The second level assessment will be written and recorded.



### 5.1.3 Assessment Review.

An assessment will be reviewed if the existing assessment is no longer valid.

A significant change in use of any hazardous substance may require an assessment to be reviewed. This may be defined as a change in the quantity used, handling method, frequency of use and number of persons exposed. The sum measure of a significant change in the use of a hazardous substance is the increase in probability of a personal exposure.

Where a user of a hazardous substance changes the manner of use of that substance they are responsible for communicating any significant change to the site manager.

### 5.1.4 Records.

COSHH assessment records are subject to a minimum 40 years retention period.

Records will be disposed of in a confidential manner after the stated retention period.

## 5.2 Monitoring of Exposure.

Airborne monitoring and swab sampling may be required as part of an assessment if there is doubt as to the significance of exposure to any hazardous substance.

When there is evidence of adequate control of exposure, routine monitoring may be employed to ensure that control measures remain effective.

If the results of any monitoring activities indicate the initial findings of the assessment should be altered, these will be recorded on a revised assessment for the task and any corrective action taken as necessary.

## 5.3 Prevention or Control of Exposure to Substances Hazardous to Health

The exposure of McSence Group employees, their Contractors and Sub Contractors, to substances hazardous to health will be prevented or where this is not reasonably practicable adequately controlled.

If the conclusion of a COSHH assessment is that the above requirement is not being met, corrective action will be taken to ensure adequate control is achieved. In the event of there being inadequate control of a substance with an MEL, corrective action must be taken immediately.

In the first instance the assessor will inform the site manager. Copies of the assessment will also be provided. A plan of action will be agreed between these individuals and implemented. On completion of the actions the assessment will be reviewed and revised and copies sent to the manager.

In spite of there being adequate control measures in place under normal operating conditions, leaks, spills or uncontrolled releases of a hazardous substance may occur. The McSence Group or their Contractors and Sub Contractors will ensure that means are available for limiting the extent of risks to health under these circumstances and regaining adequate control as soon as possible.

## 5.4 Use and Maintenance of Control Measures

The McSence Group, or their Contractors and Sub Contractors will take reasonable steps to ensure that the control measures that are provided for the purposes of section 5.3 are properly used or applied. The McSence Group will also ensure that these control measures are maintained in an efficient state, in efficient working order and in good repair.

## 5.5 Health Surveillance

Where appropriate for the protection of the health of anyone who may be exposed to a substance hazardous to health, the McSence Group, or their Contractors and Sub Contractors, will engage a competent person carry out health surveillance.

5.6 Information, Instruction and Training for persons who may be exposed to substances hazardous to health

The McSence Group and their Contractors and Sub Contractors will provide employees who may be exposed to substances hazardous to health with suitable and sufficient information, instruction and training.

Brief summaries of recently completed COSHH assessments will be discussed with the site manager and Company Safety Manager. Copies of all completed COSHH assessments will be held at the site and afterwards removed and held at Company Headquarters.

6. REFERENCED DOCUMENTS:

- ✚ Control of Substances Hazardous to Health Regulations.
- ✚ Control of Substances Hazardous to Health Regulations General Approved Code of Practice.
- ✚ Control of Substances Hazardous to Health Regulations for Carcinogens.
- ✚ Control of Substances Hazardous to Health Regulations for Biological Agents.
- ✚ Chemicals (Hazard, Information and Packaging) for Supply Regulations and Approved Supply List.
- ✚ New Substance Approval Procedure
- ✚ Exposure Monitoring Procedure
- ✚ Personal Protective Equipment Procedure
- ✚ Substance Approval Form
- ✚ McSence Limited COSHH Assessment Record

**Company Intranet – Staff Zone:** All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group's Staff Zone Intranet <https://mcsencestaffzone.wordpress.com/>

**Compliance:** Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



*McSence Group Signatory:*

**David Maxwell | Chief Executive | McSence Group**

**T: 0131 454 1500 | E: [mail@mcsence.co.uk](mailto:mail@mcsence.co.uk) | W: [www.mcsence.co.uk](http://www.mcsence.co.uk) | FB: [www.facebook.com/McSenceGroup](https://www.facebook.com/McSenceGroup)**

*Policy Amendments & Revisions: This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.*





<b>Area</b>				<b>Assessment No</b>	
<b>Location</b>				<b>Revision</b>	
<b>Process Identity</b>					
<b>Risk Assessment</b>			<b>Insignificant</b>	<b>Minimal</b>	<b>Significant</b>
<b>Assessment Date</b>			<b>Reassessment Due</b>		
<b>Action Required</b>			<b>Agreed responsibility</b>		<b>Completed</b>
<b>Assessor</b>		<b>Responsible Manager</b>		<b>Health and Safety Dept.</b>	
<b>Job Description</b>					
<b>Substances in Use</b>			<b>Form</b>	<b>Quantity</b>	<b>Toxicity</b>
					<b>MSDS Ref</b>
<b>Exposed Personnel</b>	<b>Number Exposed</b>	<b>Exposure Likelihood</b>	<b>Exposure Frequency</b>		<b>Duration</b>
<b>Control Measures in Use</b>					
<b>Sampling required</b>			<b>Frequency</b>	<b>Priority</b>	<b>LEV Record No</b>
					<b>RPE Record No</b>
					<b>Hygiene Record No</b>
<b>Additional Information</b>					

THE ABOVE ASSESSMENT SHALL BE REVIEWED FORTHWITH IF:

1. There has been a significant change in the work to which the assessment relates.
2. There is any reason to suspect that the assessment is no longer valid.

---

**Company Internet – Staff Zone:** All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group’s Staff Zone Intranet via our website [Login | McSence](#)

**Compliance:** Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



*McSence Group Signatory:*

**David Maxwell | Chief Executive**

**McSence Group - McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd**

**T: 0131 454 1500 | E: [mail@mcsence.co.uk](mailto:mail@mcsence.co.uk) | W: [www.mcsence.co.uk](http://www.mcsence.co.uk) | FB: [www.facebook.com/McSenceGroup](https://www.facebook.com/McSenceGroup)**

***Policy Amendments & Revisions:** This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.*

POLICY