4.9 COSHH Procedures

Scope of this chapter

Under the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 (as amended), The Home accepts its responsibility to comply with the current legislation.

The Control of Substances Hazardous to Health Regulations 2002 require employers to prevent employees from being exposed to hazardous (dangerous) substances. If it is not possible to prevent exposure, then it must be controlled.

Hazardous substances include the following: -

- Chemicals
- Dust
- Fumes
- Micro-organisms (biological hazards)
- Asbestos (Asbestos Management Policy Manual)

It is equally a duty under the Health and Safety at Work, etc., Act, for everyone to exercise responsibility and care in the prevention of injury and ill health to themselves and to others who may be affected by acts and omissions at work. The Registered Manager/Head Teacher will maintain overall responsibility for the management of any hazardous process or product in use on the premises.

Responsibilities include

- Undertaking a Risk Assessment of all substances used at each location.
- Product information sheets (Safety Data Sheets) to be made available.
- Substances, which pose a special risk, requiring special measures to be considered.
- Identify substances which are not allowed to be used on company property.

However, the more familiar products that are often used in residential homes can still be harmful, they may even be the same or similar to things you use in your own homes every day; such as paint, ink, glue, lubricant, detergent and beauty products such as hair colouring.

It is important to remember that **Hazardous substances** - including household chemicals and cleaning materials; can harm health if they are used wrongly. Ill health caused by these substances used at work is preventable.

If the packaging has any of the hazard symbols then it is classed as a hazardous substance. You should be aware that the old orange symbols have now been replaced (although you may still have these in stock);

Hazard pictograms alert us to the presence of a hazardous chemical. The pictograms help us to know that the chemicals we are using might cause harm to people or the environment. The CLP hazard pictograms are very similar to those used in the old labelling system and appear in the shape of a diamond with a distinctive red border and white background. One or more pictograms might appear on the labelling of a single chemical.

CLP hazard pictograms

Explosive (Symbol: exploding bomb)

Flammable (Symbol: flame)

Oxidising (Symbol: flame over circle)

Corrosive (Symbol: Corrosion)

Acute toxicity (Symbol: Skull and crossbones)

Hazardous to the environment (Symbol: Dead tree and fish)

The old 'harmful/irritant' symbol has been replaced by the exclamation mark pictogram:

Health hazard/Hazardous to the ozone layer (Symbol: Exclamation mark)

A couple of new pictograms have also been introduced:

Serious health hazard (Symbol: health hazard)

Gas under pressure (Symbol: Gas cylinder)

Cleaning products should come - and be kept - in properly labelled containers. The label gives you important information about the hazards of the substance, for example if it is toxic or likely to cause skin burns or allergic reactions.

The product should also be accompanied by a safety data sheet, which gives you more detail about a substance's hazards and the precautions you need to take.

All personnel must inform the Registered Manager/Head Teacher in advance, of the intention to procure equipment, chemicals, substances and materials, that may involve the use of (or result in people being exposed to) a hazardous substance.

As part of this process they should ensure they have received adequate information which identifies the product, and states any potential hazards and clarifies the associated precautions.

Each location must:

1. Undertake or modify an existing Risk assessment which should include information about the nature of any identified hazard/s and the strategies to follow to reduce the risk;
2. Keep a list of all substances that may pose a hazard to health. (It is the responsibility of the manager at each location to ensure this list is maintained);
3. Make sure that only staff who have received information, instruction or training in relation to the products on site (dependant on the risk identified) have access to stored chemical products. Keep the storage container locked;
4. Always segregate chemicals that might react together, keep apart;
    - Solid and liquid products;
    - Flammable and non-flammable liquids;

- Acids and alkalis; and
- Wastes.

5. Keep the store area cool and well ventilated. (Do not store products underneath stairways);
6. Safe storage - make sure your storage area can contain any spills from burst or leaking containers;
7. Store containers so their labels face forwards;
8. Provide good washing facilities;
9. Staff are not to use equipment unless they have received instruction on its use or if they think that would be unsafe, in which case they should seek further advice/ instructions before continuing;
10. Children should not use any product containing the hazardous symbols (unless this is as part of an independence programme for older children, integrated into their care plan and risk assessed separately);
11. When using any substances covered by the above regulations it is important to handle materials with due care, paying attention to manufacturers guidelines;
12. Chemicals used in the garden, garage or workshop need to be used and stored with great care. Store them in a safe place where children can't see or reach them;
13. Employees must wear any personal protective equipment specified in the COSHH Risk Assessment.

COSHH monitoring is an ongoing process with assessments being performed periodically(quarterly at least). A record of every assessment completed is to be kept in the Home/school records.

Persons working with hazardous substances shall be made aware of the dangers involved. They must have easy access to any relevant safety data and a copy of the relevant Risk Assessment.

Each unit's COSHH file should contain the Risk Assessment/s and an alphabetical or sequentially numbered index of all the Product Information Sheets relevant to that location. (These must be updated annually):

All staff should have easy access to the data file and should be made aware of its location as part of their induction.

Staff should check the specific details of the Risk Assessment and Product Sheet when dealing with a substance that they may not have used for a while;

Staff should always follow the instructions for each substance;
Items should not be left unattended, mixed or decanted into other containers;
All substances should be clearly marked and correspond with the COSHH file.

On completion of any substance being used it should be stored properly in a designated secure location.

If there is an accident or incident involving any substance you are required to inform the most senior member of staff on duty immediately and that person should take the most appropriate action.

Remember that children's behaviour may be unpredictable at times; therefore all fluids used for cleaning must be stored safely even though they may not be considered harmful under the COSHH Regulations.

If you are worried that the chemicals you use at work might be making you ill, see your GP, tell the Registered Manager/Head Teacher

COSHH monitoring is an ongoing process with assessments being performed periodically. A record of every assessment completed is to be kept in the Home/School records.

COSHH also covers asphyxiating gases and germs that cause diseases such as leptospirosis or legionnaires' disease: and germs used in laboratories.

COSHH Risk Assessment Steps

In order to achieve compliance with COSHH 2002, Managers must work through the following steps:

STEP 1 ⇨ Identify all products in use that have a hazard warning label on them, and list them on the Hazardous Substance Log Sheet. Remember, this is not only for chemicals but may cover products used for decorating, maintenance or the garden.

Chemicals without such a label will be safe to use without an assessment, (this would include washing up liquid, for example), although general principles of chemical safety must apply and instructions on product labels must be followed.

STEP 2 ⇨ Once a chemical has been identified with a hazard warning label, it is important to know what the product is used for, for example cleaning the toilet, descaling the washing machine etc. This information must be added to the Hazardous Substance Log Sheet.

STEP 3 ⇨ Identify who uses the chemical (e.g. all employees, specific employees or persons e.g. cleaner, people who use our Service and employees).

STEP 4 ⇨ Investigations should be made into whether it is necessary for that particular chemical to be used at all or whether an alternative (safer) product could be used. Again, this should be indicated on the Hazardous Substance Log Sheet.

(Repeat steps 1 ⇨ 4 for all new/alternative products in the Service).

STEP 5 ⇨ If it is not possible to substitute the product for an alternative, then measures need to be implemented to minimise exposure to employees and to ensure the product is used safely.

Control methods can include personal protective equipment or other operational methods. Information on the products' label should be followed when assessing what precautions are needed. All such safety measures should be recorded on the Hazardous Substance Log Sheet.

As the label contains so much crucial safety information, all chemicals used on site should be labelled. Labels must not be removed from any chemical. Chemicals must not be decanted into smaller bottles or trigger sprays, unless they are properly labelled and designed for chemicals. Drinking bottles etc must NOT be used.

Managers should also note and make employees aware that the Assessment carried out here is only concerned with the chemicals as they are provided. Chemicals that are mixed together either deliberately or accidentally may produce hazardous fumes or gases, or react violently. Even if the chemical does not have a hazard warning label, it may create a dangerous gas or fume etc when mixed with other chemicals.

Therefore, chemicals must be stored safely and used only in accordance with the information on the product's label.

After the COSHH Risk Assessment

Once the assessment has been completed the Manager should:

1. Make the findings of the Hazardous Substance Log Sheet available to all those employees who are affected by it (i.e. those who were identified as users in STEP 3).

All those ‘users’ should then sign to acknowledge they have seen and are aware of the Hazardous Substance Log and the identified controls, by signing against the staff training record.

2. Maintain and update the Hazardous Substance Log Sheet. For example, if new chemicals are introduced they may require adding to the sheet.

   The Quarterly Safety Checklist in the Health and Safety Manual contains a section on COSHH. This provides the opportunity to review and ensure the Hazardous Substance Log Sheet is accurate.

3. Ensure all precautions as identified as necessary on the Hazardous Substance Log Sheet are put in place and/or provided. In the case of personal protective equipment, it is up to the user to ensure they wear the personal protective equipment provided.

4. Failure to comply fully with the findings of the assessment may result in DISCIPLINARY ACTION.

Revision History

Date last updated: May 2020

Date of next review: May 2021

Date of release: May 2020