# Control of Substances Hazardous to Health (COSHH) Policy

1. **Policy Statement**

   CCM acknowledges that no substance can be considered completely safe. All reasonable steps will be taken to ensure all exposure of employees to substances hazardous to health is prevented or at least controlled to within statutory limits.

   Where practicable the company will only use/purchase substances that are deemed as low risk to health and the environment in normal use and application where this is not practicable or there is a risk that staff may come into contact with substances harmful to health the company undertakes to control exposure by effective measures where reasonably practicable.

   If exposure cannot be adequately controlled by effective measures, appropriate personal protective equipment (PPE) will be provided free of charge after consultation with employees.

   All employees will be provided with understandable information and instruction on the nature and likelihood of their exposure to all used substances and those that may be hazardous to health.

   The implementation of this policy requires the total co-operation of all members of management and staff.

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   **Signed:**

   G Doherty, Managing Director:

   **Dated:** 01/06/2016

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2. Definitions General

What are Substances Hazardous to Health?

The COSHH Regulations cover the use of substances or preparations that are hazardous to health and/or the environment. Substances are defined as individual chemical compounds. Preparations are mixtures of two or more substances, e.g. paints, cleaning products and many pesticides.

Substances or preparations hazardous to health are defined in five categories:
- substances which have certain dangers
- substances with a workplace exposure limit
- substances which are biological agents
- substances which otherwise create a risk to health
- dust

3. Scope

The scope of this policy will apply to all company operations. Control of Substances Hazardous to Health Regulations 2002 as amended, introduced to ensure that employers take steps to reduce the risks of exposure to Hazardous substances, the Regulations require a process of risk assessment and the introduction of measures to reduce the risk of exposure to the lowest level that is reasonably practicable.

The Risk Management Coordinator can provide information, training and guidance.

4. Duties of Responsible Persons

Each Senior/Key Account/Area Manager (with assistance of the Risk Management Coordinator) has the overall responsibility for:

- Obtaining and maintaining the Safety Data Sheets for all substances used by the Company. This includes updating the sheets prior to the use of any substance for a new purpose or process, or when a substance is being used for the first time.
- Preparing suitable and sufficient Risk Assessments where that is deemed necessary.
- Wherever appropriate, draw up contingency plans (or implement client’s procedures) to cope with any emergencies such as first aid procedures, spillage’s, etc. and any other specific control factors that might be required.
- Managers and Supervisors are accountable for the effective implementation of the CCM’s COSHH policy at their respective location(s). Specifically, they are responsible for:
  - Identifying all substances in use stored or transported in their areas of responsibility.
  - Informing the Risk Management Coordinator of any situation where they feel a problem exists and ensure that a risk assessment is carried out incorporated in the work/safety Instructions.
  - In conjunction with local, or the Client’s, management they will also be responsible for evolving and creating a local COSHH management plan, involving those people who have the skills and knowledge to make a useful contribution.
  - Ensuring that staff use any Personal Protective Equipment (PPE) issued, as required or directed.
  - Ensure no other chemicals or agents are introduced (except those already supplied and listed) without approval, supplier data sheet and risk assessment completed.
  - Ensure all waste (solid/liquid) generated/handled by the company is disposed of correctly according to legislation requirements (Duty of Care).
Where specialist involvement is necessary, e.g. water treatment or environmental testing, then outside Companies will be engaged on a formal and, if necessary, on a regular basis.

Managers responsible for purchasing, must ensure that only those substances that have been approved are purchased. A record of all purchases of known hazardous substance(s) must be kept and any request for the purchase of substance(s) not on the approved lists must be reported to the Risk Management Coordinator for approval and inclusion onto the approved list of products.

5. Arrangements

a. Arrangements for Securing the Health and Safety of Workers

CCM will, in consultation with staff/clients, implement the following.

- An inventory of all substances used by the company that may be hazardous to health shall be kept on site and will be maintained, with appropriate hazard information.

- Competent persons will be appointed to carry out risk assessments of the exposure to substances hazardous to health and advise on their control.

- All operations that involve, or may involve, exposure to substances hazardous to health will be assessed and appropriate control measures will be taken if elimination or substitution of the substance is not possible.

- Where appropriate, ensure that plant, extraction and other equipment such as humidifiers and air conditioning equipment is examined regularly for microbiological substances that may be hazardous to health.

- Any system of work, supervision system or any other similar measure will be reviewed at suitable intervals and revised if necessary.

- Personal protective equipment (PPE) will only be used as a last resort.

- The type and use of PPE will be assessed and maintained according to manufacturers’ instructions.

- Each assessment will be reviewed annually and all operations using hazardous substances will be reassessed every three years.

- If qualified professionals, where indicated to be necessary by the assessment, these shall be appointed and will carry out health surveillance.

- Employee health records of all exposures to substances hazardous to health (where applicable) will be kept for a minimum of 40 years.

- All employees will be provided with understandable information and appropriate training on the nature of all substances they work with. Employees will be informed about any monitoring and health surveillance results where applied.

- All changes to control measures and changes of PPE will be properly assessed and no new substances will be introduced into the workplace without prior assessment/approval.

- Wherever appropriate, draw up contingency plans (or implement client’s procedures) to cope with any emergencies such as first aid procedures, spillage’s and environmental impacts etc. and any other specific control factors that might be required.
b. General Procedures for Dealing with Health, Safety Environmental Issues

When an employee raises a point related to the use of substances hazardous to health, the organisation will:

- Ensure the hazard associated with the substance has been correctly identified
- Ensure the assessment of the use of the substance is correct and up to date
- Ensure controls in place are adequate
- Correct any observed deficiencies in the control of the hazards
- Inform the employee, and their representative if appropriate, of the results of the investigation and actions taken.

If an identified exposure has taken place, those affected and their managers and representatives, will be informed immediately. Possible health or environmental effects/impacts will, in addition, be communicated to the Risk Management Co-Ordinator for further advice and possible tertiary control response.

c. Information and Training

CCM will give sufficient information and training to ensure full understanding of the hazards to health and the environment posed by substances in the workplace and the importance of the control measures provided. Information will also be given to others who may be affected, such as:

1. clients
2. contractors
3. temporary staff
4. visitors.

Managers and supervisors of areas of the business that use substances hazardous to health will be given additional training to ensure the proper management of the risks.

d. Safe System of Work

Inadequate methods or Poorly maintained, adjusted control measures can result in inadvertent exposure to substances hazardous to health or damage to the environment.

CCM employees must be encouraged to report defects and systems must be in place for prompt repair and for the provision of temporary replacement controls, e.g. personal protective equipment (PPE) or safe storage and disposal. The following steps can be taken to minimise the risk.

- Ensure hazard information is kept up to date.
- Ensure assessments are reviewed annually and reassessed every three years or when changes are made.
- Ensure employees are trained in the nature of the hazards and use of control measures.
- Ensure controls are maintained and monitored.
- Ensure documentation is comprehensive and understandable.
- Encourage employees to report faults and problems.
e. Disposal of trade effluent (Liquid Waste)

Many of the chemicals and substances that we use for our cleaning operations are required to be diluted. After completion of these operations the liquid waste (known as trade effluent) is then disposed via an agreed route normally a foul sewer. All such disposals/discharges must be done so safely and according to relevant legislation.

For business operations the disposal/discharge of liquid effluent to ground waters or sewers is controlled by either Water Recourses Act as amended or Water Industry Act 1991 as amended both acts require consents from either the Environment Agency or local water authority to discharge trade effluent. The only effluents that are not classed as Trade Effluent are clean, uncontaminated surface water (i.e. clean rainwater which has not been contaminated when running over a site) and domestic sewage.

Trade effluent can include:
- waste chemicals, including oils
- liquid process wastes,
- detergents,
- condensate water from compressed air installations,
- cooling water,
- biodegradable liquids,
- wash water,
- liquid wastes, other than domestic sewage, discharged using sinks, basins or toilets,
- contaminated mine or quarry water

The disposal of all such trade effluent that has resulted from our operations shall only go via those routes that consent has been issued by the appropriate authority or by licensed carrier.

The responsibility of gaining consent to discharge to fowl sewer will normally rest with our clients but the company recognises its duty of care with regards to all wastes that we generate and/or handle.

The responsible manager will confirm with the client before carrying out our services on sites that all consents / agreements are in place.

f. Summary Policy Statement

Modern working methods involve the use of substances, principally chemicals, which may pose a risk to the health of people using them or to the environment because of incident.

No chemical is completely safe in all circumstances and any airborne dust, in significant quantities, can damage health. Since the hazard to health posed by many substances is not known, it is good practice to use working methods to minimise exposure.

If the hazards are known, specific steps can be taken. The seven most important steps are:

1. Identify the hazard
2. Assess the risk
3. Eliminate, prevent or control the risk
4. Maintain and monitor the controls
5. Monitor the health of the workforce
6. Ensure assessments and controls are up to date
7. Inform and train the workforce.