



St Mary's  
University  
Twickenham  
London

## Control of Substances Hazardous to Health (COSHH)

### HSPG 3

(Version 6)  
(Updated August 2023)



St Mary's University  
Waldegrave Road, Strawberry Hill,  
Twickenham TW1 4SX  
Switchboard 020 8240 4000 Fax 020 8240 4255  
[www.stmarys.ac.uk](http://www.stmarys.ac.uk)

## **Policy on the Control of Substances Hazardous to Health**

### **1. Statement of Policy**

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) as amended 2013 builds upon the general duties contained in the Health and Safety at Work Act 1974. These regulations impose duties aimed at preventing ill-health caused by exposure to hazardous substances used at work

The University will strive to comply with these regulations and will take steps to ensure that exposure of employees, and others who may be affected, is prevented or adequately controlled in accordance with the principles given in the Approved Code of Practice (ACOP) and published guidance.

The successful implementation of this policy requires the co-operation of all staff and in particular those who work with hazardous substances and those who have line management responsibility for those who do such work.

### **2. Organisation and responsibilities**

#### **2.1 Faculty / Service Managers**

will

- for areas under their control which use hazardous substances, ensure that an inventory of such substances is maintained;
- ensure that those responsible for ordering substances hazardous to health obtain Material Safety Data Sheets (MSDS) from the supplier. Suppliers have a legal obligation to supply these sheets under the Chemicals (Hazard Information and Packaging for Supply) Regulations 2009, revoked in 2015 also known as CHIP 4;

**The CHIP Regulations were revoked from 1 June 2015 and no longer have legal effect. Chemical suppliers should comply with the GB CLP Regulation.**

# Chemical classification



Chemical classification means finding out how the chemicals you supply can harm you, others or the environment. Classification is very important and provides the starting point for the controls needed to protect staff and all those who use and come across them.

## Classification

- ensure that the MSDS mentioned above are kept and made available to those who work with the hazardous substances;
- ensure that COSHH assessments are made for areas under their control where hazardous substances are used;
- ensure that exposure of persons who may be affected by hazardous substances used in areas under their control is prevented or adequately controlled;
- ensure that control measures provided in their areas are adequately maintained and properly used;
- make arrangements for staff, and if appropriate students under their control to receive adequate information on the risks to health to which they may be exposed from contact with hazardous substances and the precautions which should be taken.
- Undertake all necessary risk assessments.

## **2.2 Health & Safety Officer**

The University Health & Safety Officer will

- work with line managers and others as appropriate, to ensure that the University

fulfils its legal obligations to conduct and record COSHH assessments and to meet the other requirements of COSHH;

- keep a central record of COSHH assessments;
- advise line management on appropriate control measures to prevent or adequately control exposure;
- develop and deliver training in the safe use of hazardous substances.

### **2.3 All employees**

- will make proper use of any control measure provided for work with substances hazardous to health.

## **3. Arrangements**

### **3.1 Faculty / Service Managers will ensure:**

- in areas where substances hazardous to health are used, there will be an up to date inventory of those substances;
- for all substances hazardous to health MSDS will be obtained from the supplier, if possible in advance of the first order;
- copies of the MSDS will be kept in readily accessible places close to the point of use;
- COSHH assessments will be made either on a substance basis or on the basis of location and nature of operation. It is a legal requirement that these assessments are made before the University uses a hazardous substance for the first time;
- COSHH assessments will be reviewed at regular intervals or when the University suspects that the assessment is no longer valid;
- records of COSHH assessments will be kept for as long as they remain valid or until replaced by a revised assessment;
- where an assessment shows that control of exposure is inadequate then steps will be taken to ensure that the exposure is either prevented or adequately controlled;
- control of risks to health from hazardous substances will be in accordance with the principles given in the ACOP to the COSHH regulations. Where possible, substitution of a hazardous substance by a less hazardous one will be used. Engineering controls will be used in preference to personal protective equipment. Personal protective equipment will be issued to staff where it is not reasonably practicable to achieve adequate control by other means;

- where engineering control measures are provided they will be properly maintained, including examination and test at regular intervals. Local exhaust ventilation plant will be examined and tested at least every 12 months.
- copies of any examination and test reports will be passed to the Health & Safety Officer who will keep them for at least five years;
- where respiratory protective equipment is provided (other than disposable face masks) this will be inspected by a competent person at intervals of not more than 3 months;
- records of inspections of respiratory protective equipment will be kept in the areas where the equipment is used;
- staff, and if appropriate students, will be provided with adequate information on risks to health to which they may be exposed and the preventive and protective measures necessary to secure adequate control;
- where appropriate, staff will receive training in safe use of hazardous substances;
- all staff who work with substances hazardous to health will use the preventive and protective measures provided. They will also report any defect in the protective and preventive measures.

## Appendix I

### Definition of a Substance Hazardous to Health

A wide range of substances can be hazardous to health and these may be found in a wide variety of work environments. Chemical laboratories are obvious places to find substances hazardous to health, but many commonly encountered substances are also hazardous e.g. wood dust (particularly hardwoods), solvents used for cleaning, strong cleaning materials such as bleach or oven cleaner, some types of paint, solvent based glues, even correction fluid and the thinner used with it.

Exposure to substances hazardous to health may have short term effects (known as acute) e.g. strong acid in contact with the skin can rapidly give rise to a chemical burn. Long term exposure (known as chronic) can also have health effects e.g. the liver damage which sometimes results from ingestion of significant quantities of ethanol over a period of years.

In order to damage health, substances must first enter the body. This may be through the lungs (inhalation), through the gastro-intestinal tract (ingestion) or by contact with the skin. Inhalation gives an effective and rapid means of getting gases, vapours and fine dusts into the body as any glue sniffer or tobacco smoker will know.

A formal definition of a substance hazardous to health is given in regulation 2 of the COSHH Regulations and a simplified version of this is given below

“Substance hazardous to health” means any substance which is

- classified as being very toxic, toxic, harmful, corrosive or irritant. For commercially available substances and preparations this information is given on the label;
- a substance for which the Health and Safety Commission has approved an occupational exposure standard. These are in HSE publication “EH40”
- a biological agent;
- dust of any kind, when present at a substantial concentration in air;
- any other substance not mentioned above, but which creates a similar hazard to any substance covered by any of the above points.

“Biological agent” is defined as any micro-organism, cell culture, or human endo parasite, including any which have been genetically modified, which may cause any infection, allergy, toxicity or otherwise create a risk to human health.

## Appendix 2

### Material Safety Data Sheets

**Safety data sheets**

Products you use may be 'dangerous for supply'. If so, they will have a label that has one or more hazard symbols. Some examples are given here.

These products include common substances in everyday use such as paint, bleach, solvent or fillers. When a product is 'dangerous for supply', by law, the supplier must provide you with a safety data sheet. Note: medicines, pesticides and cosmetic products have different legislation and don't have a safety data sheet. Ask the supplier how the product can be used safely.

Safety data sheets can be hard to understand, with little information on measures for control. However, to find out about health risks and emergency situations, concentrate on:

- Sections 2 and 16 of the sheet, which tell you what the dangers are;
- Sections 4-8, which tell you about emergencies, storage and handling.

Since 2009, new international symbols have been gradually replacing the European symbols. Some of them are similar to the European symbols, but there is no single word describing the hazard. Read the hazard statement on the packaging and the safety data sheet from the supplier.

**European symbols**



**New International symbols**



Document title	<b>COSHH Policy</b>
Version	6
Person responsible	HSC
Author	Terry Docherty
Document date	March 2006
Last amended	January 2015, Aug 2016/April 2017
Effective from	March 2006 /
Review date	August 2026
Impact Assessment date	TBC
History (where discussed / who circulated to / committees considered	HSC / James Simms/Dinah Asante