

12. Control of Substances Hazardous to Health

12.1 General Statement

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

The company undertakes to control exposure by engineering means where reasonably practicable.

Where exposure cannot be adequately controlled by engineering means, appropriate PPE will be provided free of charge after consultation with employees or their representatives.

All employees will be provided with comprehensive information and instruction on the nature and likelihood of their exposure to substances hazardous to health.

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

12.2 Arrangements for Securing the Health and Safety of Workers

An inventory of all substances hazardous to health kept on site will be maintained, with appropriate hazard information.

The health and safety officer will be appointed to carry out risk assessments of the exposure to substances hazardous to health and advise on their control.

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

Engineering controls will be properly maintained and monitored to ensure their continued effectiveness. This will be achieved by planned preventive maintenance and annual monitoring.

All employees, and others who may work in the affected areas, will be informed of the purpose and safe operation of all engineering controls.

PPE will be used only as a last resort or as a back up measure during testing or modification of other controls.

The type and use of PPE will be carefully assessed and maintained according to manufacturers' instructions. Where possible, the number of different types will be minimised to prevent mistakes with servicing or replacement.

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

Health surveillance of employees, where indicated to be necessary by the assessment, will be carried out by qualified professionals.

Employee health records will be kept of all exposures to substances hazardous to health for a minimum of 40 years.

All employees will be provided with comprehensive information and appropriate training on the nature of the hazardous substances with which they are working and they will be informed about any monitoring and health surveillance results.

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.

12.3 Procedures for Dealing with Health and Safety Issues

Where an employee raises a point related to the use of substances hazardous to health the company will:

- ensure that the hazard associated with the substance has been correctly identified
- ensure that the assessment of the use of the substance is correct and up to date
- ensure that the controls in place are adequate
- correct any observed deficiencies in the control of the hazards
- inform the employee, and his or her representative where appropriate, of the results of the investigation and actions taken. If an identified exposure has taken place, those affected, and the manager and representatives, will be informed immediately. Possible health effects will, in addition, be communicated to the employee's own general practitioner.

12.4 Information and Training

The company will give sufficient information and training to ensure full understanding of the hazards to health 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 contractors, temporary staff and visitors.

The yard manager of areas that use substances hazardous to health will be given additional training to ensure the proper management of the risks.

12.5 Safe System Of Work

Poorly maintained or adjusted control measures can result in inadvertent exposure to substances hazardous to health. Employees must be encouraged to report defects and systems must be in place for prompt repair and for the provision of temporary replacement controls (eg PPE).

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 material 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 all documentation is comprehensive and comprehensible
- encourage employees to report faults and problems.

Systems of work involving the use of substances hazardous to health must be safe, so far as is reasonably practicable, under the requirements of Section 2 of the Health and Safety at Work Act 1974.

Under the Control of Substances Hazardous to Health Regulations (COSHH) employers are required to make arrangements to control the exposure of their employees to all substances which may affect their health. Exposure must be prevented or, where this is not reasonably practicable, adequately controlled. The Regulations expand measures relating to the control of harmful micro-organisms. They also introduce arrangements for notifying the HSE when biological agents are first used in a workplace.

Where a substance has been assigned a workplace exposure limit (WEL), there is a duty to reduce exposure to below the WEL and so far as is reasonably practicable.

Personal protective equipment, when used to control exposure, must be considered as a last resort but, if necessary, steps must be taken to ensure proper use by the employee.

This equipment must conform to the requirements of the Personal Protective Equipment Regulations 1992 (PPE).

Measures introduced to control exposure must be maintained, examined and tested to ensure their continued effectiveness. Where exposure cannot be prevented, monitoring of employee exposure to hazardous substances may be required.

Employee health surveillance, including biological monitoring, is required for exposure to certain substances hazardous to health.

Employers have a duty to give suitable and sufficient information, instruction and training to employees exposed to substances hazardous to health.

12.6 Record Keeping

Under the provisions of COSHH, records should be kept of the following.

- Inventory of hazardous substances.
- Assessment of risks of exposure.
- Control measures provided.
- Methods of use of control measures and defect/fault reporting.
- Examination, testing and repairing of control measures. Either the record itself, or a summary, must be kept for a minimum of five years.

- Exposure monitoring: for five years if a record of background exposure and for 40 years if a record of exposure of an identifiable employee.
- Individual health record of exposure or potential exposure for 40 years from date of last entry.
- Training given to employees.