Health and Safety Services

UNIVERSITY OF GREENWICH

Code of Practice for Control of Substances Hazardous to Health (COSHH)

Contents

1. Overview

The COSHH Regulations require employers to assess the risk to their employees, and to prevent or adequately control those risks.

2. Purpose

This document outlines the control measures appropriate for meeting legal requirements and promotes best practice for work involving the use of substances hazardous to health. It aims to provide those responsible for the use of hazardous substances with information on the steps they need to take to ensure compliance with current legislation, including the Control of Substances Hazardous to Health (COSHH) Regulations and Dangerous Substances and Explosive Atmospheres (DSEAR) Regulations.

3. Scope

This code of practice applies to all University of Greenwich staff, students, contractors, and visitors who may be exposed to hazardous substances during their activities on University premises or while engaged in University business. Where appropriate, this code of practice should be incorporated into Faculty or Directorate local policies and procedures.

This Code of Practice does not apply to asbestos, lead, or radioactive substances, which are subject to separate regulations; hazards arising solely from the physical properties of substances (e.g. fire, explosion, or pressure), unless there is an associated health risk; or non-occupational exposure to biological agents.

4. Definitions

"Hazardous Substance" - Is any substance, mixture, or biological agent with the potential to cause harm to human health.

Under COSHH, this includes any substance that:

- Is classified as very toxic, toxic, harmful, corrosive, or irritant
- Has an approved Workplace Exposure Limit (WEL) set by the HSE
- Is a biological agent (e.g. bacteria, viruses, fungi), including genetically modified organisms (GMOs)
- Is generated in the form of dust, fumes, vapours, mists, or gases during work activities
- Presents a risk to health due to its chemical or toxicological properties and the way it is used or present in the workplace, even if it does not fall into the above categories

"WEL" - Workplace Exposure Limit as defined by the Health and Safety Executive (HSE).

"Safety Data Sheet (SDS)" - A document provided by the manufacturer or supplier containing information on the properties of a hazardous substance, including its hazards, safe handling, storage requirements, emergency measures, exposure controls and disposal considerations.

"Local Exhaust Ventilation (LEV)" - An engineering control system designed to capture, contain and remove airborne hazardous substances such as dusts, fumes, vapours, mists

or gases at or near their point of generation, thereby reducing exposure to persons in the workplace.

"Biological Safety Cabinet (BSC)" - A ventilated enclosure designed to provide protection to personnel, the environment and/or biological materials from exposure to biological agents through the controlled filtration and containment of airborne contaminants.

"Health Surveillance" - A system of ongoing health checks used to identify early signs of work-related ill health in individuals exposed to certain hazardous substances where a COSHH assessment indicates there is a residual risk to health.

"Exposure Monitoring" - The measurement and assessment of employee exposure to hazardous substances in the workplace to determine whether control measures are effective and whether exposure is being adequately controlled, including compliance with any applicable Workplace Exposure Limits (WELs).

5. Roles and Responsibilities

5.1. Governing Body

- Hold ultimate accountability for ensuring the University complies with the Control of Substances Hazardous to Health (COSHH) Regulations.
- Ensure effective governance arrangements are in place for the management of substances hazardous to health.
- Provide oversight of health and safety performance, including risks arising from hazardous substances.
- Ensure sufficient resources are allocated to implement COSHH requirements.

5.2. Vice-Chancellor

- Ensure the University meets its statutory obligations under COSHH Regulations.
- Provide strategic leadership for the effective management of health and safety, including COSHH
- Ensure appropriate management structures, systems and resources are in place.
- Delegate responsibilities while retaining overall accountability for compliance

5.3. University Secretary

- Oversee the implementation of health and safety governance frameworks, including COSHH arrangements.
- Ensure health and safety risks, including those from hazardous substances, are appropriately managed and reported.
- Provide assurance to the Governing Body on compliance and performance.
- Support the integration of COSHH into wider corporate governance arrangements.

5.4. Senior leadership

Is responsible for:

- Ensuring suitable and sufficient risk assessments are carried out for all activities involving substances hazardous to health, associated with their Faculty/Directorate activities including teaching, research and support
- Ensuring that risk assessments are conducted before the activity commences

- Ensuring that the risk assessments are kept up-to-date, reviewed periodically (at least annually) and revised as necessary

5.5. All Faculty Staff (including Academics, Researchers and support Staff)
Is responsible for:

- Ensuring that suitable and sufficient risk assessments are carried out for all activities involving substances hazardous to health being undertaken for teaching and/or research within their areas
- Ensuring that all students for which they are responsible, who are undertaking activities involving substances hazardous to health, are made aware of and are familiar with risk assessments relevant to the work being undertaken
- Ensuring that all risk assessments for activities under their control are reviewed annually or sooner if there is a change in personnel, equipment used, substances used, new or revised relevant legislation or an incident involving the process to which the risk assessment relates
- Ensuring that employees who require health surveillance as identified by a COSHH risk assessment are referred to Occupational Health and participate in the appropriate health surveillance programme.

5.6. Professional Services (Supervisory/Managers) Staff
Is responsible for:

- Ensuring that suitable and sufficient risk assessments are carried out for all activities involving substances hazardous to health being undertaken within their areas of responsibility
- Ensuring that all staff for which they are responsible, who are undertaking activities involving substances hazardous to health, are made aware of and are familiar with risk assessments relevant to the work being undertaken
- Ensuring that all risk assessments for activities under their control are reviewed annually or sooner if there is a change in personnel, equipment used, substances used, new or revised relevant legislation or an incident involving the process to which the risk assessment relates

5.7. Health and Safety Managers
Is responsible for:

- Providing competent advice on compliance with COSHH Regulations and associated legislation.
- Supporting senior managers in the implementation of effective COSHH arrangements.
- Coordinating and overseeing health and safety management systems within their area.
- Monitoring COSHH compliance, identifying gaps, trends and areas for improvement.
- Ensuring that significant issues are escalated to senior management.
- Supporting the development and review of risk assessments and control.
- Promoting effective communication, training and awareness throughout.
- Assist in the investigation of incidents involving hazardous substances.

5.8. Scientific and Biological Safety Advisor

Is responsible for:

- Ensuring that suitable and sufficient risk assessments are made where necessary for projects and research where biological agents are involved.
- Writing, reviewing and issuing Codes of Practice and guidance associated with substances hazardous to health used at the University
- Advising and assisting with the provision of suitable training of personnel involved in the use of substances hazardous to health

5.9. The Biological and Genetic Modification Safety Committee

Is responsible for:

- Monitoring and reviewing relevant teaching, research and support activities and advising management, staff and students on relevant health and safety aspects of work associated with genetic modification

5.10. Health and Safety Local Officers

Is responsible for:

- Supporting local implementation of COSHH procedures and assist with risk assessments.

5.11. Health & Safety Services

Is responsible for:

- Making available the information and forms referred to in this Code, either directly or through the University Health and Safety web pages.
- Liaising with Faculty Operating Officers/Directors of Professional Services and Local Safety Officers on the implementation of this Code of Practice
- Providing advice to FOOs/Directors, Occupational Health Service and Local Safety Officers on health and safety issues arising from work with substances hazardous to health
- Liaising with the Occupational Health Service, Faculty Operating Officer/Director of Office and Local Safety Officer as necessary, where health or medical problems relating to the use of, or exposure to, substances hazardous to health have been notified.

5.12. All staff & Students

Is responsible for:

- Following the control measures indicated in the risk assessments associated with any activities being undertaken
- Informing their tutor or line manager of any incidents involving substances hazardous to health and/or associated equipment which have or may have caused injury to themselves or others.

5.13. Contractors

Is responsible for:

- Communicating with their designated University representative to ensure successful onboarding onto SOTERweb.
- Designating a competent employee within their organisation to act as the SOTERweb administrator and providing their contact details to the University.
- Uploading risk assessments and COSHH assessments for all hazardous substances intended for use on University premises via SOTERweb.
- Ensuring that all assessments are: Specific to the activity and location, reviewed and updated regularly or when changes occur and compliant with current COSHH regulations and University policies.
- Following all control measures outlined in the submitted risk and COSHH assessments.
- Ensuring that all employees are trained and competent in applying these control measures effectively.
- Familiarising themselves with the University's emergency procedures for incidents involving hazardous substances.
- Contractors must ensure that their employees understand the COSHH assessments and control measures applicable to the work being undertaken before commencing activities.

5.14. Suppliers

Is responsible for:

- Providing suitable and sufficient information by way of manufacturers' safety data sheets and any other relevant information in connection with materials and substances supplied for use by University staff or students.

See also HSE resources on Labelling and Packaging of hazardous substances and provision of REACH information and Safety Datasheets

6. Procedure

As with many other health and safety duties, the underlying management principles of COSHH, i.e. finding out what you have and then deciding what to do, are most easily documented within a risk assessment.

Suitable and appropriate COSHH risk assessments must be carried out for any activities requiring the use of substances hazardous to health. The depth of this COSHH risk assessment will vary depending on the complexity and degree of risk. The format of the assessment will therefore need to reflect this.

COSHH assessments must be reviewed regularly to ensure they remain suitable and sufficient. As a minimum, assessments should be reviewed annually and sooner where there are significant changes to the substances used, work processes, equipment, legislation, following an incident or near miss, or where monitoring or health surveillance indicates that existing control measures may no longer be effective.

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6.1. COSHH - Inventory

Each Faculty/School and Directorate shall maintain an up-to-date inventory of substances hazardous to health used, stored or generated within their areas. The inventory should include:

- Substance name
- Storage location
- Responsible person
- Current Safety Data Sheet (SDS)
- Associated COSHH assessment reference

Inventories should be reviewed at least annually and updated whenever substances are introduced, removed, substituted or where Safety Data Sheets are revised.

New hazardous substances should not be introduced into the workplace until a suitable COSHH assessment has been completed and an up-to-date Safety Data Sheet (SDS) has been obtained.

Hazardous substances should be stored in accordance with manufacturer recommendations and Safety Data Sheets. Incompatible substances should be segregated, containers clearly labelled and storage areas maintained to minimise the risk of accidental exposure or release.

6.2. COSHH assessment – First steps

When completing a COSHH risk assessment, the first step is always to consider whether exposure can be prevented.

To do this you will need to understand the extent of the risk presented to staff, students, visitors and anyone else affected, giving consideration to:

- The hazardous properties and health effects of the substance and /or the approved classification of any biological agent (e.g. from labels or as described in the material safety datasheet or other trade information provided by the supplier).
- The level, type and duration of potential exposure.
- The circumstances of the work, including the amount of the substance(s) involved.
- Activities such as maintenance, where there is potential for a higher level of exposure.
- Any relevant workplace exposure limits (WEL).
- The results of relevant health surveillance or exposure monitoring.
- Whether there are any persons who may be particularly vulnerable to exposure, such as young persons, expectant or new mothers, or individuals with pre-existing health conditions, and whether additional control measures are required.

- Where the work involves exposure to more than one hazardous substance, the risk presented by such substances in combination.

6.3. The 8 Principles of good practice

If you are not able to prevent exposure, you need to control it adequately by applying the eight basic principles of good practice.

- **Minimise emission, release and spread;** Design and operate processes and activities to minimise emission, release and spread. Both the processes and procedures need to be considered, and any sources of exposure should be reduced in number, size, emission or release rate, as much as possible.
- **Consider the routes of exposure;** Exposure can occur through inhalation, skin absorption and ingestion. The physical, chemical and infectious properties of a substance, along with how it is used, can have a great bearing on which route of exposure is most important.
- **Choose control measures that are proportionate to the risk;** Control measures that are adequate will take into account the nature and severity of the hazard and the magnitude, frequency and duration of exposure.
- **Choose effective control options;** Choose the most effective and reliable control options for the circumstances. These should be directed at the main sources and causes of exposure, to minimise the escape and spread of substances hazardous to health.
- **Personal Protective Equipment (PPE);** Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment.
- **Review the effectiveness of controls;** Check and regularly review all elements of control measures for their continuing effectiveness
- **Provide Information and Training;** Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks.
- **New Measures, New Risk;** Ensure that the introduction of any control measures does not increase the overall risk to health and safety.

For substances that cause occupational asthma, cancer or damage to genes that can be passed from one generation to another, exposure **must** be reduced as far as reasonably practicable, below the Workplace Exposure Limit (WEL). However, the principles of good practice can be applied to any substance, irrespective of whether the substance has a Workplace Exposure Limit (WEL).

Further information, on what to consider when completing a COSHH risk assessment, can be found in the Health and Safety Executive (HSE) guidance:

- HSG97: HSE Step by Step Guide to COSHH assessment
- INDG136: Working With substances hazardous to Health; A brief guide to COSHH

Additional information about specific types of COSHH risk assessment, and associated considerations, can be found as described below:

- Genetically modified materials webpages

- Carcinogens, Mutagens and Substances Toxic to Reproduction guidance
- Asthma and respiratory sensitizers
- HSE Book: SACGM Compendium; Risk Assessment of Genetical Modified Microorganisms
- HSE Approved list of Biological Agents
- Nanotechnology - HSE

6.4. Effective Control Options

Protection measures should be appropriate to the activity and should follow the hierarchy of control. They should be considered in the following order of priority:

- Eliminate or substitute the hazardous substance where reasonably practicable, or use systems or processes that are inherently safe by design (e.g. reduce the amount of hazardous substance used or produced or use equipment which totally encloses the process).
  • Control exposure at the source through engineering controls such as adequate ventilation, and minimise the number of employees exposed, together with the level and duration of exposure.
  • Use suitable personal protective equipment (PPE) only where adequate control cannot be achieved by other measures and as the last line of defence or resort.

Any control measures introduced should be properly and fully used and regularly maintained to ensure they remain effective:

- Local exhaust ventilation, including fume cupboards and biological safety cabinets, must be inspected and tested every 14 months
- Respiratory protective equipment (except disposable masks) must be examined and tested regularly
- Records of inspections, tests and repairs must be kept for at least five years

If, after all reasonable controls have been implemented, there is still a risk of a rare but severe exposure to one or more hazardous substances, or if the work involved carcinogens, mutagens or biological agents, you must consider arrangements to deal with any accident, incident or emergency that may involve these substances. This should include consideration for:

- First aid facilities and arrangements for treating exposure to hazardous substances.
- Evacuation procedures where there is a risk to occupants.
- Appropriate spill response procedures, including spill containment, clean-up methods, disposal of contaminated materials and the availability of suitable spill kits where required.
- Emergency contacts and arrangements for notifying emergency services where necessary.
- Provision of relevant COSHH information and Safety Data Sheets (SDS) to emergency responders where appropriate.

6.5. Training

Where required, suitable training should be provided to all personnel who may use hazardous substances and / or use equipment in which hazardous substances are used, processed or produced.

The level of training should be reflective of the risk / complexity of equipment being used.

6.6. Personal protective clothing and equipment (PPE)

Where necessary, after all other precautions have been taken, appropriate personal protective equipment (PPE) such as gloves, eye protection and respirators should be provided and used. It must be ensured that any PPE provided is of the correct type and standard for the substance(s) and equipment being used.

Further guidance on selecting the correct PPE can be found on the HSE Personal Protective Equipment Microsite

6.7. Health Surveillance / Exposure Monitoring

- Exposure monitoring may be necessary where there is reason to believe that current control measures are not adequately controlling exposure or where it is necessary to demonstrate compliance with an applicable Workplace Exposure Limit (WEL).
- Health surveillance may be required where there is a recognised disease or adverse health effect associated with exposure to a hazardous substance (e.g. dermatitis, asthma or certain cancers) and, despite the implementation of all reasonably practicable control measures, there remains a residual risk to health.
- Health surveillance should not be regarded as a substitute for effective control measures. Rather, it provides an additional means of confirming that control measures remain effective and detecting early signs of work-related ill health.
- The purpose of health surveillance is to identify adverse health effects arising from the use of, or exposure to, hazardous substances at an early stage, enabling appropriate intervention and reducing the risk of further harm.
- Health surveillance is an ongoing process and may include self-reporting or self-examination, assessments by a supervisor or manager where appropriate, and referral to or assessment by the University's Occupational Health Service.
- Records relating to individual health surveillance must be retained for a minimum of 40 years.
- Records of exposure monitoring and other relevant monitoring activities must be retained for a minimum of five years.

6.8. Environmental monitoring

Where the use of hazardous substances may lead to contamination of the air, water or ground, environmental monitoring should be considered and carried out if appropriate.

6.9. Hazardous waste disposal

Waste generated from the use of hazardous substances may need to be disposed of as hazardous waste. This waste could be residual material, intermediate substances generated by a process or paper / cloths used to clean up spillages.

For further information about the management of Hazardous Waste, please refer to the University Code of Practice for Hazardous Waste.

6.10. Checklist and Forms

There is no legal requirement that determines the format of a COSHH risk assessment. It is the responsibility of the COSHH assessor to determine which format is best suited to document the substance or process being assessed.

The following University templates may be considered suitable:

- The University COSHH assessment form would typically be used for lower risk substances, used on their own or as part of a simple mixture.
- The University Science risk assessment form could be used to record the risk / associated controls, where multiple substances are being used.

In addition, the HSE website has several example COSHH assessments for specific industry types, which may be used as reference documents.

Please note, there are separate risk assessment forms for notification of Genetic Modification work.

6.11. Out of Hours and "High Impact" Operations

Any work or process involving hazardous substances that will or may be required to operate out of hours, or are 'high impact' activities, e.g. activities in which a failure of a component or equipment can lead to fire, explosion or escape of toxic substances; requires the Estates and Facilities Directorate (EFD) to be notified, using the High Impact Activity Notification form.

This form should also be used for unattended running of apparatus outside normal hours.

High impact activities, involving flammable or explosive substances, should also be subject to a DSEAR (Dangerous Substances and Explosive Atmospheres Regulations) risk assessment, and suitable controls implemented as appropriate.

7. Further Guidance

7.1. Related Legislation:

In addition to the general duties contained in the Health and Safety at Work etc Act 1974, other, more specific sets of Regulations and guidance may apply.

Links to these and further general guidance on COSHH risk assessment can be found on HSE web pages;

- HSG97: A step by step guide to COSHH assessment,
- INDG136 Hazardous substances at work: A brief guide to COSHH
- EH40/2005 Workplace exposure limits - HSE

7.2. Related University documents:

- Health & Safety Arrangements: Genetically Modified Materials
- COSHH - Carcinogens, Mutagens and Substances Toxic to Reproduction | Documents | University of Greenwich

7.3. Other related guidance:

- The Genetically Modified Organisms (Contained Use) Regulations 2014 - HSE
- Asthma and respiratory sensitizers
- HSE Book: SACGM Compendium; Risk Assessment of Genetical Modified Microorganisms
- The Approved List of biological agents: Advisory Committee on Dangerous Pathogens
- Nanotechnology - HSE
- Labelling and packaging - HSE
- Chemical safety data sheets - COSHH

8. Document History

This document will be reviewed at least annually.

Details of previous reviews are as follows:

Review Date	Reviewer	Summary of Review
26-06-2026	Anastasia Liasides – Health and Safety Advisor & Michelle Owusua Appiah-Agyekum Health and Safety Advisor	Update from V.19 webpage to V26.1 – Transferred CoP onto new template. Added more definitions with improved descriptions. Added section 6.1 COSHH – Inventory requirements. Expanded the review wording (e.g. following changes to substances, processes, incidents or legislation, not just the annual review). Added more detail around emergency arrangements/spill response, where appropriate. A simple process diagram in the appendix to help users navigate the COSHH process more easily.

9. Appendix A- COSHH Process Overview