

Control of Hazardous Substances Policy

Originator name:	Clive Parkinson
Section / Dept:	Health and Safety
Implementation date:	19 June 2015
Date of next review:	2018
Related policies:	Health and Safety Policy; Piped Compressed Gas Systems and Standalone Gas Cylinder Policy; Asbestos Policy; Biosafety and Biosecurity Policy; Hazardous Working Policy; Dangerous Substances and Explosive Atmospheres Policy; Radiation (Ionising) Safety Policy
Policy history:	1 st Edition in new format (previous format dated Feb 2012)

Version History

Version	Author	Revisions Made	Date
-	Clive Parkinson	First Draft (old format)	February 2012
1	Danny Bosdet	Change to new format and general updating of policy	June 2015

Approval History

Equality Analysis

Version	Reviewed by	Comments	Date
1	Equality & Diversity Jo McCarthy Holland	Approved – low E&D impact assessment	11 June 2015

Committee Sign Off

Version	Committee Name	Date of Sign Off
1	Health and Safety Committee	19 June 2015

1	Introduction
1.1	Purpose
1.1.1	The University of Surrey uses a variety of substances within its estates, facilities, teaching and research activities. Some of these substances have harmful or hazardous properties and may pose a risk to human health or harm to the environment. This policy details the management arrangements and responsibilities for control of hazardous substances used, including disposal at or by the University of Surrey.
1.2	Scope
1.2.1	This policy applies to all University of Surrey staff (including visiting academics), students and contractors employed by the University who use hazardous substances.
1.2.2	This policy applies to the use of hazardous substances on all University of Surrey sites as well as any work off-site that is required or deemed necessary.
1.2.3	Supervisors and managers have a duty of care placed upon them to actively monitor the implementation of this policy. As persons directing the work supervisors and managers have a crucial role in ensuring that any work with hazardous substances is carried out safely and in accordance with all relevant legislation.
1.3	Equality Analysis
1.3.1	<p>Consideration is given to the protected characteristics of all people groups identified in the Equality Act 2010. The protected characteristics include: gender, age, race, disability, sexual orientation, religion/belief, pregnancy and maternity, and marriage/civil partnership.</p> <p>The University recognises the need for specific measures to ensure the health and safety of each of these groups. This policy and all other associated Health and Safety related policies take this into account.</p>
1.4	Definitions
1.4.1	Hazardous Substance <p>The term 'Hazardous Substance' is very broad and includes chemicals, biological agents, carcinogens, dusts, flammable materials and gases which have the potential to cause harm to human health (both physical and chemical).</p> <p>A hazardous substance also includes any substance that may cause harm to the environment during its use or disposal.</p>
1.4.3	Competence, Training and Briefing <p>Competence is based upon training and is equipping staff, students (and others where the University has a duty-of-care) with relevant skills and knowledge to deal appropriately with a given health and safety situation.</p> <p>Briefing is informing such persons of relevant knowledge in relation to health and safety.</p>

	Training and briefing will be made available in a range of formats according to the needs of the trainee and different groups of staff, students and others.
1.4.3	<p>Accessibility</p> <p>The duty to make reasonable adjustments, as far as possible, to ensure that all staff and students (and others where the University has a duty-of-care) with a disability have equal access to everything they need to do a job or studies as those persons without a disability.</p>
1.5	Legislative context
1.5.1	Adherence to this policy will ensure compliance with all relevant statutory regulations, specifically The Health and Safety at Work Act 1974 and The Control of Substances Hazardous to Health Regulations 2002 (as amended).
1.6	Health & Safety Implications
1.6.1	This forms part of the range of Health and Safety Policies created to manage the health and safety of all relevant stakeholders.
2	Policy
2.1	Principles
2.1.1	This policy aims to prevent exposure of staff, students, visitors, and contractors to hazardous substances. In situations where this is not possible, exposure will be controlled and reduced to a level that is as low as is reasonably practicable.
2.1.2	This policy aims to mitigate and limit the effects of exposure to hazardous substances in emergency situations to staff, students, contractors, members of emergency services and members of the public.
2.1.3	This policy aims to ensure compliance with relevant legislation for the procurement, use, storage, transport and disposal of hazardous substances.
2.1.4	This policy aims to reduce the impact to the environment by the use or disposal of hazardous substances at or by the University, using the best available environmental option.
2.2	Procedures
	The University will assess and adequately control the risks created by the use, storage, transport and disposal of hazardous substances by implementing the following procedures and measures.
2.2.1	<p>Where the prevention of exposure to hazardous substances is not reasonably practicable, exposure will be adequately controlled by following the Health and Safety Executive (HSE) hierarchy of controls' as listed below:</p> <ol style="list-style-type: none"> 1) Substitution by a less hazardous substance. 2) Reduction in the amount of substance that is used or stored. 3) The implementation, use and maintenance of engineering controls. 4) The implementation and enforcement of procedural controls, e.g. safe systems of work. 5) The provision and use of Personal Protective Equipment (PPE).

2.2.2	The University will ensure that buildings, plant and equipment provided for the purpose of controlling hazardous substances are adequately maintained and that adequate records of such maintenance are kept.
2.2.3	The University will make arrangements for any health surveillance that is required and will retain adequate records relating to such surveillance.
2.2.4	Where appropriate the University will monitor exposure to hazardous substances.
2.2.5	The University will provide adequate and suitable training to users of hazardous substances.
2.2.6	The University will provide suitable and sufficient information and instruction to users of hazardous substances.
2.2.7	The University will ensure that competent and appropriate supervision is available.
2.2.8	The University will ensure that persons are in place to provide competent advice.
2.2.9	The University will ensure that there are appropriate emergency plans, equipment, personnel and procedures in place to deal effectively with foreseeable adverse incidents.
2.2.10	The University will take steps to ensure that consideration is given to the disposal of hazardous substances prior to acquisition. This will be determined by the application of Best Available Technique (BAT) and of the Waste Hierarchy as detailed in the Waste Regulations 2011.
2.2.11	The University will ensure that appropriate records relating to the procurement, use and disposal of hazardous substances are complete and adequately maintained.
2.2.12	The University will ensure that hazardous substances are packaged, labelled, stored and transported appropriately, in accordance with relevant statutory Regulations.
3 Governance Requirements	
3.1 Responsibility	
3.1.1	<p>The Director of Health & Safety is responsible for the following:</p> <ul style="list-style-type: none"> (a) Auditing compliance with this policy, including procurement, use, storage and disposal of hazardous substances. (b) The provision of advice, training and guidance to all persons within the University, Faculties and Directorates regarding compliance with this policy. This advice may be given directly or through the appointment of competent persons. (c) Ensuring that this policy and accompanying guidance is current and correct. (d) Liaising with any relevant Regulatory authorities. (e) Ensuring that all waste is disposed of in accordance with the Hazardous Waste Regulations (2005) apart from 3.1.2.

<p>3.1.2</p>	<p>The Director of Estates and Facilities Management (EFM) is responsible for the following:</p> <ul style="list-style-type: none"> (a) Making arrangements for the disposal of Waste Electronic and Electrical Equipment. (b) Making arrangements for the disposal of all other non-hazardous wastes.
<p>3.1.3</p>	<p>Deans and Directors* are accountable for the provision of measures to ensure the following:</p> <ul style="list-style-type: none"> (a) Due consideration is given to the disposal of hazardous substances prior to their acquisition. (b) All hazardous substances used within their Faculty/Directorate are assessed prior to use and that exposure to any substance is managed. Where prevention is not reasonably practicable then exposure must be adequately controlled. (c) All control measures which are deemed necessary are maintained and effective. (d) Staff and students have sufficient instruction and information and are adequately trained and supervised. (e) Adequate arrangements are made, where required, to monitor exposure to hazardous substances. (f) Any staff or students who meet the criteria for health surveillance attend for this surveillance and that appropriate records are kept. (g) Any recommendations made by the University Occupational Health Service are actioned and that records are kept. (h) Adequate arrangements are in place where facilities are shared or where staff and students are working on premises managed by other employers. (i) Adequate emergency plans and procedures are in place to deal with foreseeable adverse events. (j) Rules and procedures are implemented to ensure that hazardous substances are stored, transported, packaged, labelled and disposed of appropriately. (k) Sufficient resources are made available to enable compliance with this policy. (l) Any required licences are up to date, that suitable arrangements are in place for storage, and that complete records are maintained pertaining to the use and storage of controlled or dangerous agents. <p><i>* A Director is defined for the purposes of this policy as those having hazardous substances within or used by personnel controlled within their Directorate.</i></p>
<p>3.1.4</p>	<p>Managers and Supervisors (including academic) of staff and students are responsible for ensuring the following.</p> <ul style="list-style-type: none"> (a) Consideration is given to the disposal of hazardous substances prior to their acquisition.

	<ul style="list-style-type: none"> (b) Prior to using hazardous substances a suitable and sufficient risk assessment has been written, approved and documented. (c) Any control measures identified by the risk assessment, including those advised by Occupational Health, have been fully implemented. (d) Work is only begun when a risk assessment has been undertaken. The Supervisor must ensure their 'reportee' has either carried out their own risk assessment or has read and fully understood any risk assessment that has been written for the particular activity. (e) That adequate information, instruction, training and supervision is provided. (f) That the Dean/Director and Faculty/Unit Health & Safety Advisor has been informed of any activity where the risk assessment has indicated that there is a high residual risk associated with a particular activity. (g) A copy of any risk assessments must be available and provided if requested.
<p>3.1.5</p>	<p>Staff and Students who work with hazardous substances must comply with the following requirements.</p> <ul style="list-style-type: none"> (a) A suitable and sufficient risk assessment must be carried out before working with hazardous substances. This risk assessment must be approved by an appropriate Supervisor/Manager. (b) Staff/Students must read and fully understand any risk assessment that has been completed by somebody else in relation to their use of hazardous substances. (c) Consideration must be given to the storage and disposal of hazardous substances prior to their acquisition. (d) All students/staff must follow all Local/University rules and procedures regarding the safe and hygienic handling of hazardous substances. (e) Any measures identified by the risk assessment must be fully implemented and assessed prior to work beginning. (f) To use and maintain any Personal Protective Equipment (PPE) provided in an appropriate manner. If a risk assessment identifies PPE as a control measure then staff/students must use it. (g) To report any defects, errors or omissions in the procedure, PPE or equipment. (h) To report any accidents or near misses that occur whilst using hazardous substances to their Supervisor/Manager and <i>via</i> the University reporting procedure. (i) To undertake any training deemed necessary by the University. (j) To attend any Occupational Health appointments required for health surveillance and to cooperate with this process.

	<p>(k) To report any health concerns they may have regarding the use of hazardous substances to their Supervisor/Manager.</p>
<p>3.1.6</p>	<p>Managers and Supervisors of contractors have the following responsibilities.</p> <ul style="list-style-type: none"> (a) To make contractors aware of this policy and any other factors that may affect the contractors' risk assessment. (b) To ensure that a written risk assessment has been undertaken where hazardous substances are to be used. (c) To monitor and ensure that any control measures identified by the risk assessment have been implemented. (d) To advise contractors of any risks to them deriving from any University activities occurring in the areas they are working. (e) To ensure that any required Permit to Work is in place and is approved.
<p>3.1.7</p>	<p>Contractors must comply with the requirements of this policy in the following ways.</p> <ul style="list-style-type: none"> (a) By carrying out a risk assessment for any work that will require the use of hazardous substances prior to work commencing. (b) By implementing any control measures, including emergency procedures, identified by the risk assessment. (c) By providing adequate information, instruction, training and supervision to their staff and ensuring that they are competent to work with hazardous substances. (d) By providing any PPE that is required to work safely with hazardous substances. (e) Arrange suitable health surveillance should it be deemed necessary.
<p>3.1.8</p>	<p>Health and Safety Advisers have the following responsibilities</p> <ul style="list-style-type: none"> (a) To give competent and informed advice to all users regarding the safe use of hazardous substances. (b) To provide training as required and in a format that is appropriate; to monitor the uptake and effectiveness of this training. (c) To monitor adherence to safe working practices and procedures. (d) To investigate any adverse incidents arising during the use of hazardous substances in order to identify the root cause. (e) To remain up to date and informed regarding current best practice and legislation pertaining to the use of hazardous substances.

3.2	Implementation / Communication Plan
3.2.1	<p>Leaders alert to managers.</p> <p>Policy will be placed on University Policy Website and also be available on Health and Safety pages.</p> <p>A copy of the Policy will be placed in lab safety folders (where appropriate).</p> <p>The Policy will be explained during local training which is provided to all staff and students.</p> <p>The policy will be introduced during Induction Training.</p> <p>Hazardous substances training will reference this Policy.</p> <p>The Health and Safety Handbook given to all staff will reference this Policy.</p>
3.3	Exceptions to this Policy
3.3.1	None
3.4	Supporting documentation
3.4.1	<p>Health and Safety Policy; Piped Compressed Gas Systems and Standalone Gas Cylinder Policy; Asbestos Policy; Biosafety and Biosecurity Policy; Hazardous Working Policy; Dangerous Substances and Explosive Atmospheres Policy; Radiation (Ionising) Safety Policy</p>

Equality Analysis Template

for all University Policies

Organisational Sign Off by Equality and Diversity Team:	NAME OF POLICY: <u>CONTROL OF HAZARDOUS SUBSTANCES POLICY</u>
	<input checked="" type="checkbox"/> Low Equality Impact (Minor input to Policy to reflect equality considerations)*
	<input type="checkbox"/> Medium to High Equality Impact (Equality Analysis template completed)
	<input checked="" type="checkbox"/> Sign off received
	Signed off by: <u>Jo McCarthy-Holland</u>
Position: <u>Equality Adviser</u>	
Date: <u>11/06/15</u>	

Note: This Template must be used in conjunction with the associated Equality Analysis Guidance Notes, which can be accessed from the [Equality and Diversity Website](#)