

# DURHAM CONSTABULARY



*Altogether Better Policing*

## **Control of Substances Hazardous to Health (COSHH) Policy**

<b>Application</b>	Police Officers, Police Staff and Special Constables
<b>Policy Owner</b>	Human Resources
<b>Version</b>	1
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<b>Durham Constabulary Freedom of Information Act Publication Scheme</b>	



**1.0 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH) POLICY**

**2.0 PURPOSE AND SCOPE**

- 2.1 The purpose of this policy is to minimise the risk of injury to both members of the public, Durham Constabulary Police Officers, Staff and Special Constables by determining the necessary measures to be taken to comply with statutory provisions.
- 2.2 To ensure suitable Control of Substances Hazardous to Health (COSHH) risk assessments are undertaken to remove, reduce or alleviate any risks when carrying out any activities involving substances hazardous to health, including the disposal of contaminated equipment/implements.
- 2.3 To seek to control and minimise exposure to hazardous substances which may arise out of or in connection with work, which is under the employer's control.
- 2.4 To ensure that any incidents where Police Officers, Staff or Special Constables have or may have been exposed to hazardous substances are investigated and appropriate advice and health surveillance is offered.

**3.0 THE LEGAL BASIS AND LEGITIMATE AIMS**

- 3.1 Durham Constabulary is required to comply with the requirements of the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 2002.
- 3.2 Throughout the operation of this policy Durham Constabulary will seek to take the least intrusive action which fits within the working policy criteria and will act fairly and proportionally to achieve the proposed purpose
- 3.3 Durham Constabulary will operate within the policing principles as defined by the College of Policing Code of Ethics and in support of this our policies will seek to promote Accountability, Fairness, Honesty, Integrity, Leadership, Objectivity, Openness, Respect and Selflessness.
- 3.4 The Force recognises the contribution of its entire staff and is committed to creating a fully inclusive working environment. This will be achieved by making reasonable adjustments where appropriate, valuing the differences that a diverse workforce can bring and challenging unlawful and unfair discrimination, bullying, harassment, victimisation and other unfair treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, ethnicity, religion or belief, gender and sexual orientation.

#### **4.0 POLICY STATEMENT**

- 4.1 Durham Constabulary shall carry out suitable and sufficient COSHH risk assessments of health and safety risks that Police Officers, Police Staff and Special Constables may be exposed to whilst at work.
- 4.2 Durham Constabulary will ensure that all reasonable steps are taken to ensure that risks arising from exposure to substances hazardous to health are prevented or at least controlled to within statutory Workplace Exposure Limits (WELS), which are outlined in the Health and Safety Executive's document EH 40.

#### **5.0 RESPONSIBILITIES**

- 5.1 The Chief Constable has overall responsibility for ensuring that Senior Management Teams put in place the necessary management systems for the effective implementation of all risk management policies.
- 5.2 Heads of Commands are responsible for ensuring where substances hazardous to health are in use or being stored in their Commands that they arrange for a competent and trained member of staff to carry out and record COSHH risk assessments and to act as the Command COSHH Coordinator.
- 5.3 Line/Project Managers are Responsible for:
- i) Ensuring COSHH Assessments are carried out and recorded for all substances hazardous to health.
  - ii) Ensuring all staff know where to access COSHH information and have in place, appropriate processes and procedures for the control of substances hazardous to health.
  - iii) Checking and signing risk assessments.
  - iv) Informing relevant staff of all new COSHH assessments, to enable them to comply with the findings (before any work commences).
  - v) Ensuring that any member of staff, who may through the course of their work be exposed to a hazardous substance, receives appropriate information, advice and instruction, in order to minimise their exposure.
- 5.4. Supervisors are responsible for ensuring that their staff are provided with understandable COSHH information and are instructed in safe working procedures for work with substances hazardous to health. Supervisors must ensure that appropriate safety procedures are in place and recorded to deal with accidents, incidents and emergencies involving substances hazardous to health.

## 5.5 COSHH Coordinators

- i) Members of staff who have been nominated and trained as COSHH Coordinators will carry out risk assessments for all substances hazardous to health. The assessment must include control measures and safe working procedures to eliminate exposure, or if this is not possible, outline appropriate measures to minimise exposure to levels within statutory Workplace Exposure Limits (WELS). Advice and guidance will be provided to nominated COSHH Coordinators by the Health & Safety Advisor.
- ii) Coordinators are responsible for documenting the COSHH assessment information on the COSHH risk assessment form (H&S 22).
- iii) The COSHH Coordinator will maintain an inventory of all substances hazardous to health currently in use and any relevant hazard information for their Command.

## 5.6 Staff

- i) All staff who work with substances hazardous to health should be made aware of this guidance document and be familiar with the Constabulary's COSHH risk assessment process.
- ii) All staff have a legal responsibility to take reasonable care of themselves and others whilst at work and to follow any information or instruction for their safety. This includes an awareness of the risks they may be exposed to at work and knowing what action to take to prevent or control the risks.
- iii) Must follow safe working practices which may include wearing any personal protective equipment (PPE) clothing or equipment provided in the interests of health and safety.
- iv) Staff are legally obliged to highlight to their manager/supervisor any concerns they may have in relation to working with hazardous substances and follow agreed safe working procedures.

## 5.7 Health and Safety Advisor

- i) Will provide (when requested) professional advice and guidance to assist Managers, Supervisors and COSHH Coordinators in the completion of their COSHH risk assessments and any necessary safe systems of work.
- ii) Will act as the Constabulary's overall COSHH Coordinator.

5.8 Head of Estates will ensure that adequate resources are available to remove or control exposure to substances hazardous to health via appropriate engineering controls.

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These controls must be suitably maintained and monitored by planned preventative maintenance programmes, and appropriate records maintained.

- 5.9 The Occupational Health professionals are responsible for providing health advice on the effects of exposure to a hazardous substance and advice on setting up health surveillance programmes.

**6.0 COSHH RISK MANAGEMENT**

- 6.1 An assessment of risk is a careful examination of any activity in police work involving substances that may cause harm to people and whether any precautions which have been taken are sufficient to prevent such harm both to Police Officers, Staff, Specials and others who may be affected by their activities.
- 6.2 Waste chemical, substances and oils from photographic, vehicle maintenance, fingerprinting and many other processes are also covered by COSHH, as are cleaning materials and substances generated by work, such as dust or other waste products. Blood-borne virus infections from infected people, infected bodies, contaminated objects are also covered by the Regulations.
- 6.3 All persons liable to be affected by the work activity, including contractors and visitors, must be included in the assessment.
- 6.4 The risk assessment principles will apply regardless of whether a substance has Workplace Exposure Limit or not. These are;
- i) COSHH Co-ordinators should take into account all relevant routes of exposure, inhalation, skin absorption and ingestion when developing control measures.
  - ii) Control measures in place should be proportionate to the health risk.
  - iii) Choose the most reliable control options to minimise the escape and spread of hazardous substances.
  - iv) Where adequate control of exposure cannot be achieved by any other means, provide suitable personal protective equipment (PPE).
  - v) Check and review regularly all control measures for continuing effectiveness.
  - vi) Inform individuals of the hazards and risks from the substances with which they work and the control measures developed to control the risks.

## 6.5 Hierarchy in Controlling Risks (preferred order)

- i) Eliminate/remove - by changing the process or activity
- ii) Substitute - replace it with a safer alternative
- iii) Isolate - the dangerous substance from operators
- iv) Enclosure of the process - to prevent operators/other workers being exposed
- v) Local exhaust ventilation - to remove toxic fume or dust at source
- vi) General ventilation - with fresh air
- vii) Good housekeeping - to minimise accidental contact
- viii) Minimise the time of exposure - or the number of people exposed
- ix) Training - in the use of engineering controls
- x) Personal protective clothing and equipment - provide as appropriate
- xi) Good welfare facilities - to aid high standards of personal hygiene
- xii) Medical surveillance - to detect early signs of ill health

## 7.0 COSHH ASSESSMENT PROCESS

- 7.1 When carrying out a COSHH assessment, the COSHH Co-ordinator should gather as much relevant information about the substances, the work process and the working practices, to enable them to determine what the problems are (if any) and possible solutions. Most of the required information will be found on the Manufacturers Hazard Data Sheet for a particular substance. The data sheets can often be down loaded from the internet or obtained from the manufacturer/supplier. However, it is important to remember that the data sheet is not a COSHH risk assessment but its detail is an important part of the risk management process.
- 7.2 Substances known to be hazardous are given maximum workplace exposure limits, which are stated in Health and Safety Executive's EH40 (available on intranet). As part of the risk assessment it is important to consider how a substance is used, as this can greatly affect the potential to cause harm.
- 7.3 Apply the risk assessment principles and the hierarchy of COSHH controls to minimise any possible exposure to hazardous substances.

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- 7.4 Draw up an inventory of all hazardous substances which are used in your Command.
- 7.5 Identify substances that do not require a re-assessment, i.e. if they have no risk because the existing controls are adequate or the process itself entails no risk.
- 7.6 Carry out COSHH risk assessments of all remaining substances (usually one assessment for each process or substance) by completing COSHH risk assessment form (H&S 22).
- 7.7 Consultation with Health & Safety Advisor, Federation and Unions must take place before any new substance is used for the first time or a new process introduced. It is a breach of health and safety legislation to use a hazardous substance which has not been risk assessed.
- 7.8 Special "at risk" groups would normally include: young persons, work experience, volunteers, expectant mothers and possibly some staff with specific disabilities. Health and Safety legislation requires the protection of all special "at risk" groups which may require the implementation of additional safeguards which should be identified on the Command's risk assessments.

## **8.0 EXPOSURE TO HAZARDOUS SUBSTANCES**

- 8.1 There is now an increased recognition of the potentially serious long-term health effects of exposure to certain substances deemed to be hazardous. Not all hazardous substances are chemicals; radioactive substances and certain biological agents may have long term effects on health. Neither are the hazards confined to fumes or dust; many liquids and certain solids pose a hazard through skin absorption.
- 8.2 If any member of staff whilst in the workplace or at the scene of an incident, or after attending an incident, develop any health problems they will be advised to go to hospital or to see their Doctor as a precautionary measure. They or their supervision must report any exposure by completing an entry on the electronic Origin Health and Safety Reporting System (HSR).
- 8.3 If any member of staff attends the scene of an incident in which a hazardous substance is known (or suspected) to have been present they must, even if no immediate symptoms are apparent, contact the Health & Safety Advisor/Occupational Health Nurse and complete an entry on the electronic Origin Health and Safety Reporting System.
- 8.4 In cases of doubt as to whether a substance comes within the above category the advice of the fire service must be sought by contacting the Control Room at Fire Brigade Headquarters giving the following information, where possible:-

- (i) United Nations Number
- (ii) Chemical Name
- (iii) Hazchem Code
- (iv) Tremcard Number
- (v) Trade Name
- (vi) Name and Address of Manufacturer

- 8.5 Upon receipt of the notification, the Health & Safety Advisor in liaison with the Occupational Health Nurse will, if appropriate, investigate the incident and offer medical screening.
- 8.6 The member of staff should also be advised to contact their staff association/union for advice and support as required.
- 8.7 Any incidents of exposure reported on the previous paper based system (pers 140 Record of Exposure to Hazardous Substances) will be retained on an individual member of staff's Occupational Health file, access to which will be governed by the Confidentiality of Occupational Health Medical Records Policy.

## **9.0 MONITORING COMPLIANCE**

- 9.1 COSHH auditing will be undertaken as part of Health and Safety Advisor's inspections and the results of this shared with the Health Management Group.

## **10.0 TRAINING**

- 10.1 The Constabulary recognises that information, advice and instruction are an integral part of the requirement for the successful implementation of risk management and compliance with the COSHH regulations. The aim is to provide COSHH Co-ordinators with the appropriate level of information, advice and instruction necessary to successfully implement the requirements of the COSHH Policy

## **11.0 APPEALS PROCEDURE**

If an individual wishes to appeal against any decision made in connection with this policy, they should write to or email, the Deputy Chief Constable at the below address within 14 days of receiving a decision. The appeal will be considered and consultation will take place with appropriate individuals to establish all facts before a decision with regard to the appeal is made. A response to the appeal will be provided in writing within 10 working days of receipt of the appeal. Should this period not be achievable the individual will be notified in writing when a decision will be communicated.



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The Deputy Chief Constable  
c/o Human Resources  
Police Headquarters  
Aykley Heads  
Durham  
DH1 5TT  
Email [human.resources@durham.pnn.police.uk](mailto:human.resources@durham.pnn.police.uk)

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## **DURHAM CONSTABULARY**

### **EQUALITY IMPACT ASSESSMENTS (EIA)**

This form **MUST** be completed by the Policy/Function lead when developing or reviewing policies or procedures which may impact on the way Durham Constabulary conducts its business (both inside and outside of the force) and which may affect one or more of the **NINE 'Protected Groups'** as defined by the Equality Act 2010 i.e. **Age, Gender, Transgender, Disability, Ethnicity, Religion/Faith, Sexuality, Marriage/Civil Partnership and Maternity/Pregnancy.**

The Equality Act 2010 (Section 149) sets out a specific general equality duty for all public sector bodies to, in the exercise of their functions, have due regard to the need to:-

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

As a Public Sector organisation we **MUST** show that when we are making decisions of a strategic nature we:-

- Give due regard to the impact it will have on protected groups
- Provide an audit trail of any assessment undertaken which identifies how the policy or procedure is likely to affect protected groups, and
- Undertake an assessment prior to any decisions around policies/procedures being ratified.

**This form should be completed, attached to the relevant policy/procedural document and submitted to the Policy User Group or other strategic group for ratification** (See Section 5) ***NB – use extra sheets if necessary.***

**PLEASE CONTACT AN HR MANAGER SHOULD YOU NEED ANY ASSISTANCE IN COMPLETING THIS FORM.**

<b>SECTION 1 - OVERVIEW OF POLICY /PROCEDURE</b>	
<b>Policy /Procedure Title</b>	COSHH Policy
<b>Person Completing the EIA</b>	Sylvia Horsfield, HR Manager
<b>Purpose of the Policy?</b>	<p>The purpose of this policy is to minimise the risk of injury to both Members of the public, Durham Constabulary Police Officers, Staff and Special Constables by determining the necessary measures to be taken to comply with statutory provisions.</p> <p>To ensure suitable Control of Substances Hazardous to Health (COSHH) risk assessments are undertaken to remove, reduce or alleviate any risks when carrying out any activities involving substances hazardous to health, including the disposal of contaminated equipment/implements.</p> <p>To seek to control and minimise exposure to hazardous substances Which may arise out of or in connection with work, which is under the employer's control.</p>

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	To ensure that any incidents where Police Officers, Staff or Special Constables have or may have been exposed to hazardous substances are investigated and appropriate advice and health surveillance is offered.	
<b>Explain briefly why the Policy/Procedure is being developed/reviewed</b>	This policy now includes the exposure to hazardous substances policy and has been subject to updating to reflect current procedures	
<b>SECTION 2 – NEGATIVE IMPACT</b>		
<b>Is there potential for adverse impact or discrimination on any of the protected groups mentioned above <i>and what actions if any will be taken.</i></b>	<b>Age:</b>	No potential for adverse impact has been identified
	<b>Gender:</b>	No potential for adverse impact has been identified
	<b>Transgender:</b>	No potential for adverse impact has been identified
	<b>Disability:</b>	No potential for adverse impact has been identified
	<b>Ethnicity:</b>	No potential for adverse impact has been identified
	<b>Religion &amp; Belief:</b>	No potential for adverse impact has been identified
	<b>Sexuality</b>	No potential for adverse impact has been identified
	<b>Marriage / Civil Partnership:</b>	No potential for adverse impact has been identified
	<b>Maternity /Pregnancy</b>	No potential for adverse impact has been identified

<b>SECTION 3 – CONSULTATION &amp; RESEARCH</b>	
<b>Who has been consulted and what Research has been done around Equality during the development/amendment of the policy/procedure?</b>	<p>All support networks.  Force Executive (AC0)  HR Staff  Independent Advisory Groups (IAG's)  Staff associations  Business Disability Forum  Legal Services  Stonewall  Heads of Command</p>

**SECTION 4 – POSITIVE IMPACT**

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<p><b>What does the evidence/Research found in Section 2 show with regard to positive impact on Equality? i.e. how will the people identified be affected in a good way.</b></p>	<p>Durham Constabulary shall carry out suitable and sufficient COSHH risk assessments of health and safety risks that Police Officers, Police Staff and Special Constables may be exposed to whilst at work.</p> <p>Durham Constabulary will ensure that all reasonable steps are taken to ensure that risks arising from exposure to substances hazardous to health are prevented or at least controlled to within statutory Workplace Exposure Limits (WELS), which are outlined by the Health and Safety Executive</p>
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<p><b>Confirm the above Actions have been incorporated and the EIA is now ready for submission to PUG or other Strategic Group.</b></p>	<p><u>Signature</u>... <i>S.A. Horsfield</i>      <u>Name</u> S.A. HORSFIELD</p> <p><u>Date</u> 1<sup>st</sup> August 2014</p>
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<b>SECTION 5 - RATIFY THE POLICY/PROCEDURE</b>		
<p><b>RATIFICATION AT PUG /other Strategic Group</b> <i>include any pertinent points made at meeting.</i></p>		<p><b>Date of Meeting</b></p> <p><b>Signature – Chair of Meeting</b></p>

<b>SECTION 6 – REVIEW/MONITOR</b>	
<p><b>DATE POLICY/PROCEDURE TO BE REVIEWED? (3 years or sooner if required)</b></p>	
<p><b>PERSON IDENTIFIED RESPONSIBLE TO REVIEW</b></p>	

- ONCE RATIFIED:**
- 1) Attach the original document to the **FINAL** draft of the Policy/Procedure
  - 2) Forward a copy to the HR Manager, Diversity

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