COSHH: Control of Substances Hazardous to Health

Module 8
Review and monitoring

Objective:
In this module, you will learn the importance of keeping assessments up to date, how to record assessments and how to make sure controls are working.

Reviewing assessments
A COSHH assessment should be reviewed immediately if:

- There is any reason to suppose that the original assessment is no longer valid, e.g., evidence from the results of examining and testing engineering controls, reports from supervisors about defects in control systems or the results from any monitoring exposures.
- Any of the circumstances of the work should change significantly and especially one which may have affected employees exposure to a substance hazardous to health.
- The requirement is for a regular review of the assessment. This does not mean that the whole assessment process will have to be repeated at each review. The first purpose of review is to see if the existing assessment is still suitable and sufficient, and to reexamine existing control measures. If it is, then you do not need to do any more.
- If it appears that the assessment is no longer valid. It does not mean that the whole assessment has to be revised. Only those parts that do not reflect the new situation need amending.
- After an accident or other significant incident.
- New information about the hazardous substance becomes available.

A COSHH assessment should be revisited to ensure that it is kept up to date and applicable persons should do this regularly.

Whether or not there is any real change in the situation, there is an absolute requirement to review the situation on a regular basis. Without this, there is a danger that gradual change over a period of time could go unnoticed and the assessment could become unfit for its purpose by default. The date of the first review and the length of time between successive reviews will depend on the type of risk, the work, and the employer’s judgement on the likelihood of changes occurring. The COSHH Regulation gives guidance on how often assessments should be reviewed; however, it depends on the type of risk, the work and the supervisions’ judgement about the likelihood of changes occurring.

Use and maintenance of control measures
Control is achieved through ways of working and behaviour (laboratory rules). This includes operating procedures, supervision, the provision of training, emergency procedures, decontamination and “permits to work” for tasks such as maintenance. It also entails testing all control measures regularly to make sure that they work properly.

Laboratory rules should include the use of gloves, eye protection and good personal hygiene.

This is particularly important with substances labelled as R34 or R35 (causes burns; causes severe burns), R41 (risk of serious damage to eyes) or R36 (irritating to eyes). Where control measures are in place, it is important to use them properly.

This includes:
- wearing any PPE necessary;
- using control equipment;
- following hygiene procedures;
- speaking up if anything appears to be wrong.
Records of examinations, tests and repairs to equipment should be kept for at least five years (from the date on which it was made).

For equipment, it is important that it is maintained in an efficient state, in efficient working order in good repair, and in a clean condition. This helps to identify any trends or variations in equipment deterioration. Upholding the laboratory rules is a duty of managers and supervisors and following them is a duty of individuals, and as such is regarded as a control measure.

Routine checks on controls should be part of the normal daily or weekly tasks of designated laboratory staff.

To facilitate checking, equipment such as ventilated hoods and fume cupboards should be fitted with simple visual indicators of effective operation (e.g., air flow indicators or differential pressure gauges). Any necessary repairs or maintenance should be initiated immediately and actions recorded. It is advisable to keep a log of reported defects in the laboratory and when they have been repaired.

**Occupational exposure monitoring**

All engineering controls require thorough examination and testing at specified intervals depending on the risk, and in the case of LEV at least once every fourteen months. Competent persons, with appropriate specialist knowledge, must carry this out, certify the equipment and provide suitable records that should be kept.

Despite the use of engineering controls supplemented by PPE, it may sometimes be necessary to make certain that exposure is controlled and the health of individuals is protected. In which case, occupational exposure monitoring of individual exposure to specific chemicals is carried out. For airborne contaminants, the measurement will normally involve collecting samples of air from the individual’s breathing zone using sampling equipment. It may also mean biological samples. Examples of this might be monitoring for solvents, dusts or pharmaceutical drugs, which can cause sensitisation reactions in some individuals.

Exposure Monitoring is undertaken to confirm the exposures and to determine that the correct control measures were selected and are in place and functional. In general, the greater the risk from a specific chemical in a particular workplace, the greater the need for monitoring to ensure the continued effectiveness of control measures. Monitoring normally makes reference to “Workplace Exposure Limits” (WELs) or Biological Monitoring Guidance Value (BMGV) published in the UK by the Health and Safety Executive in a document known as EH40. These exposure limits should not be exceeded.

Where monitoring is required, laboratory managers are responsible for ensuring that competent persons using validated methods carry it out. The results of any monitoring should be made available to both laboratory management (who are responsible for any remedial action) and to the relevant workers that are affected or their representatives.

**Record keeping**

Records of occupational exposure monitoring and assessments should be kept locally within the relevant laboratories and must be available to people potentially exposed and to their representatives where appropriate.

Employers are required to keep suitable records of any examinations and tests carried out on control measures and of any repairs done as a result of such examinations and tests. Records (or suitable summaries) must be kept available for at least five years.

**Employers are required to keep suitable records of any monitoring carried out.**

Records or summaries must be kept for at least:

- 40 years, in cases in which they represent personal exposures of identifiable employees
- 5 years in other cases
However, the RSC recommends that all records should be kept for at least 40 years. Where health surveillance is required, employers must ensure that health records of the employees involved are made and that records or copies are kept for at least 40 years from the date of the last entries made.

The objective of the COSHH regulations are to ensure that every element of a control measure performs as originally intended, and contributes to adequately controlling the exposure of individuals to substances hazardous to health. A control measure is adequate when the risk of harm is “as low as is reasonably practicable”.

“So far as is reasonably practicable” means that measures are taken up to a point where the taking of further measures becomes grossly disproportionate to the risk. The greater the risk, the more likely it is that it is reasonable to go to substantial expense, trouble and invention to reduce it.

- All control measures are in good working order.
- Exposures are below the Workplace Exposure Limit, where one exists.
- Exposure to substances that cause cancer, asthma or genetic damage is reduced to as low a level as possible.

Learning assessment 6

1. Spot the workplace hazard in the photograph of the laboratory.

How many hazards can you spot in the following photograph?

- a. 1
- b. 2
- c. 3
- d. 4
- e. 5

2. Spot the workplace hazard in the photograph of the waste bin.

How many hazards can you spot in the following photograph?

- a. 1
- b. 2
- c. 3
- d. 4
- e. 5
3. Spot the workplace hazard in the photograph of the bench.
How many hazards can you spot in the following photograph?
a. 1  
b. 2  
c. 3  
d. 4  
e. 5

4. Spot the workplace hazard in the photograph of the hazards in the fume cupboard.
How many hazards can you spot in the following photograph?
a. 1  
b. 2  
c. 3  
d. 4  
e. 5

Check your answers on the separate answer sheet.