



NORTHAMPTONSHIRE FIRE AND RESCUE SERVICE
Control of Substances Hazardous to Health (COSHH)

STANDARD OPERATING PROCEDURE (SOP)

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| Title | Control of Substances Hazardous to Health (COSHH) |
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| Executive summary | This SOP details how NFRS discharges its duties and manages COSHH legislation and guidance. Both generally and at operational incidents. |

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| Job title | Health and Safety Adviser |
| Date | October 2021 |
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1 INTRODUCTION TO THE REGULATIONS

The Control of Substances Hazardous to Health Regulations 2002 (as amended (COSHH)) requires all employers to ensure, as far as is reasonably practicable, that exposure to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled.

This document is intended to provide information, instruction and guidance to enable the control of substances hazardous to health in the workplace and is relevant to all employees, contractors, visitors and all other persons for whom NFRS has a direct or indirect responsibility.

Employers are responsible for ensuring that substances hazardous to health are assessed and exposure either prevented or adequately controlled. The term 'hazardous substance' is defined in [appendix A](#).

Occupiers of premises must make visitors (including members of the emergency services) aware of any substances on the premises that could offer a significant risk to their health; likewise NFRS employees must also make visitors to premises aware. The term 'significant risk', as defined in DCOL 4/91, is shown in [appendix A](#).

Items for which COSHH is applicable include all cleaning products (liquids, solids or aerosols etc.), lubricating oils, degreasing products, paints, chemical and biological substances be they gases, solids or liquids. This is not a finite list but demonstrates the variety of general and specialist substances which fall within the scope of the Regulations.

2 IMPLEMENTATION

NFRS will take the following steps in order to achieve adequate control and comply with legislation:

Identify and carry out risk assessments of substances present in the workplace.

These may be substances used during a particular activity, found on site during emergency operations or substances that may be formed as a result of such an activity.

Control exposure where any substance presents a health risk. This will be done in the following order:

- 1) Prevention of exposure by elimination, substitution or enclosure
- 2) Controlling of exposure by restricting personnel, limiting exposure time or by the use of a fume extrication system
- 3) If the above measures do not provide adequate control, then the use of Personal Protective Equipment (PPE) will be considered

Ensure that any equipment, control measures and PPE identified in the risk assessments are available, properly used and that employees understand the reasons for such provisions.

These are detailed in service policy B4 – Respiratory Protection, Technical Bulletins specific to equipment, Operational Information – Breathing Apparatus (BA) Documents and Operational Guidance Documents on Decontamination.

Ensure that any equipment provided is maintained and tested as necessary

and that the records of any maintenance and testing are maintained.

These are detailed in service policy Equipment Manuals specific to equipment, Operational Information – BA Documents and Operational Guidance Documents on Decontamination.

Monitor exposure to specific substances and, where necessary, carry out health surveillance, recording all findings as required.

Provide sufficient information, instruction and training to any employee who may be exposed to any hazardous substance.

The operational incident type of 'workplace' is detailed below at [section 9 – Operational Incidents](#).

The Health and Safety Executive (HSE) treat an operational incident as a workplace for which we must generically assess and provide safe systems of work.

3 MANAGEMENT RESPONSIBILITIES

The Chief Fire Officer (CFO) will discharge their duties under these regulations through the normal lines of management. They will ensure that the resources required to implement this procedure are made available and that nominated managers have clearly defined Health and Safety responsibilities.

They will also ensure that any staff selected to carry out the requirements of this procedure are competent to do so. A **competent person** is any person who has sufficient expertise, training and experience to carry out the requirements of this document.

Managers will have responsibilities including:

- The organisational procurement procedure will include purchase of environmentally friendly products which are as safe as reasonably practical
- Provide assessments, technical bulletins and COSHH data etc.
- Where necessary providing secure accommodation for substances
- Provide appropriate PPE

4 HEALTH AND SAFETY DEPARTMENT RESPONSIBILITIES

With respect to any COSHH substances used or produced on NFRS premises, the Health and Safety Adviser shall:

- Give guidance and information on the suitability of products
- Advise on the measures required to control exposure, including the purchase of any PPE for use in accordance with a COSHH assessment
- Monitor as necessary, ensuring control of exposure and compliance with the Regulations and guidance

5 FLEET, EQUIPMENT, VEHICLE AND FACILITIES MANAGER RESPONSIBILITIES

Managers will have these additional responsibilities.

The Fleet, Equipment, vehicle and Facilities Managers shall:

- Seek advice from the Health and Safety Team, when required regarding the purchase or substitution of any new product deemed to be hazardous
- Ensure that Manufacturers' Safety Data Sheets are obtained for all COSHH substances
- Carry out suitable and sufficient COSHH assessments upon receipt of Manufacturers Safety Data Sheets (MSDS), or Safety Data Sheet (SDS) and review against HSE EH40 Workplace Exposure Limits
- Ensure that MSDS and COSHH assessments held in Control are current

Additionally, the Equipment Manager will be responsible for ensuring that all local exhaust ventilation systems are tested by a competent person, as required by the Regulations and that appropriate records are retained.

The Facilities Manager Enabling services shall:

- Liaise with relevant NFRS personnel to ensure safe working practices

6 LINE MANAGER RESPONSIBILITIES

All managers have a responsibility to ensure that substances which are covered by COSHH for use by NFRS employees are:

- Obtained **only** from NFRS Stores
- Used **only** following the completion of a COSHH assessment and the appropriate control measures being in place

Report any safety event or near-miss incidents as per service policy E2 - Safety Event Reporting and Investigation Procedures.

Any system failures or problems related to the use of COSHH substances must also be reported to the Health and Safety Team, whether or not they have been resolved locally.

7 EMPLOYEE RESPONSIBILITIES

All employees are responsible for ensuring that they:

- Consult the relevant COSHH assessment prior to using any hazardous substance, using FB032d, FB032e..
- Make proper use of all control measures as detailed in the relevant COSHH assessment
- Report any defects or system failures to their line manager who will then report as per service policy E2 – Safety Event Reporting and Investigation Procedures, and liaise with the Health and Safety Adviser as necessary

8 ASSESSMENT PROCEDURES

8.1 Managers action

A COSHH assessment must be carried out and recorded on the correct FB032d form, if one is required.

MSDS/SDS; Chemical suppliers are required to supply these where chemicals are supplied for use at work (CLP Regulation). Chemical classification: The GB CLP Regulation

8.2 Health and Safety Team action

The Health and Safety Team will notify relevant personnel upon release of revised EH40 for them to take appropriate action regarding products used by the Service or where employees are likely to be exposed to in the course of their employment, specifically in reference to Table 1 and Notice of Approval (COSHH).

8.4 Generic information

Future editions of the stores catalogue will identify those substances considered to be hazardous to health under COSHH Regulations.

All premises will have a link to the COSHH risk assessments from their station/property pages of such COSHH assessments as are relative to tasks that are carried out within those premises FB032d and FB032e. These are available to all personnel. Please follow the link for COSHH Risk Assessment and Safety Data Sheets.

Stores will maintain a reference file of safety data sheets received for products used but assessed as being non-hazardous to health under COSHH Regulations.

Cleaning contractors procured and working on NFRS sites will ensure provision of COSHH assessments and relevant MSDS, to be held on site.

All other contractors will ensure provision of COSHH assessments and relevant MSDS will be held as deemed appropriate by the Facilities Manager Enabling Services.

8.5 Assessment procedures for new products

Where possible, only products listed in the supplies catalogue should be used.

The appropriate manager will liaise with the Health and Safety Team and complete a COSHH assessment based upon the substances/products intended foreseeable use.

Managers will make arrangements for completion of (FB032d and FB032e) and follow service consultation requirements. Following approval stores will distribute FB032d and the substance/product.

In all cases a manufacturer's safety data sheet must be obtained from the supplier and a COSHH assessment carried out as above, prior to the product being used. This includes occasions where a sample product is being 'trialled' by the user.

9 **OPERATIONAL INCIDENTS**

The COSHH Regulations clearly have an impact on the Service when attending operational incidents. It is, however, not possible to conduct assessments of all hazardous substances that operational personnel may come into contact with when attending incidents.

Information related to COSHH are contained within Operational Policy and Guidance.

Exposure to hazardous substances in the Fire and Rescue Service is controlled by:

- Fire and Rescue Service operational controls
- Provision documentation based upon Legislation and National Operational Guidance
- NFRS Mobilising policy including Specialist Officers (Hazardous Materials and Environmental Protection Officers (HMEPO), Detection, Identification and Monitoring Officers (DIM))
- Information, instruction, training and supervision
- Provision and wearing of PPE including; chemical protection suits, other protective clothing and equipment
- Provision and wearing of BA
- Health surveillance (Occupational Health (OH) and Specialist Advisers)

These precautions will be adequate to control many of the risks to which firefighters may be exposed. There are, however, a number of circumstances in which they may not suffice. These will include:

- Those cases where the Incident Commanders (ICs)/line manager may perceive no risk, e.g. exposure to low levels of sensitising agents that may cause no problems except to individuals who have developed, or are developing a sensitivity
- Exposure to substances that may penetrate protective clothing, e.g. Concentrated Hydrofluoric Acid or some Phenol compounds
- Attendance at certain types of premises such as the factories or research and development facilities of drugs manufacturers
- Exposure to certain substances with a carcinogenic or teratogenic potential, e.g. MbOCA (a carcinogen) at rubber works

Awareness of these types of hazards may have been notified by occupiers of premises or gained through inspections under 7 (2) d of the Fire Services Act 2004, and may be communicated to attending crews via Mobile Data Terminals (MDTs).

Where premises are identified, risk intelligence is available on MDTs/Vehicle Mounted Data Systems (VMDS) installed on appliances. Additional information may be obtained from Chemdata.

The IC/line manager will assess the risk to firefighters and implement appropriate control measures.

ICs/line managers should also consider the implications of contamination during rest periods at incidents, e.g. eating and smoking, and take measures to continue to control exposure. Personnel **MUST NOT** eat, drink or smoke without permission from the IC in consultation with HMEPO/DIM Officers

Where it is suspected that any NFRS employee may have been contaminated, form FB087 (pre-printed, available from Stores) must be completed as detailed in Operational Documents on Decontamination and retained in their Personal Record File (PRF) for 40+ years.

Police/NFRS/Environment Agency/Health Protection Agency will advise other agencies or persons of any potential contamination and actions to be taken.

10 PREMISES UNDER THE CONTROL OF NFRS – VISITS AND INSPECTIONS

NFRS employees frequently enter premises that are not under the control of the Service; where there may be additional risks of being exposed to hazardous substances in the course of carrying out their duties.

The COSHH Regulations place a duty on all employers to protect all people who may be affected by their work, this includes making members of the emergency services aware of any substances on the premises that may offer a significant risk to health.

Where the occupying employer has carried out a COSHH assessment, employees of NFRS will co-operate fully in complying with any safe systems of work that are in place.

NFRS employees will take any further precautions and use additional PPE as supplied and as necessary identified by the IC/ line manager.

11 REFERENCES

- Health and Safety at Work etc Act 1974. section 6, section 53
- Control of Substances Hazardous to Health Regulations
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- EN 481: *Workplace atmospheres. Size fraction definitions for measurement of airborne particles*
- Confined Spaces Regulations 1997
- Workplace (Health, Safety and Welfare) Regulations 1992
- Personal protective Equipment at work Regulations 1992
- Incident Command
- Operational Guidance Hazardous Materials
- A guide for Senior Managers
- A Guide for Fire Service Managers
- Training Model
- Dynamic Management of Risk at Operational Incidents
- Operational Guidance Generic Risk assessment; All Incident types; and:
 - 5.3 Incidents Involving Chemicals
 - 5.4 Biological Hazards
- NFRS Service policies:
 - B4 - Respiratory Protection
 - B13.1-13 Chemical Incidents (Hazmats)
 - B21 - Flooding Incidents
 - B26 - CBRN Incidents
 - B29 - Illicit Drug Laboratories
- NFRS Standard Operating Procedures (SOPs):
 - EM5.5 - Radiation
 - EM5.9 - Asbestos
 - EM7.5.10 - Decontamination
 - EM7.23 - Terrorist Incidents
- AHIS - Asbestos
- Operational Guidance Documents on Decontamination
- Operational Information – BA Documents
- NFRS Equipment Manuals (EMs) and Standard Test and Maintenance Procedure (STaMPs) as applicable to all equipment either used in relation to the above or; cleaning, maintenance or substance used within or associated.

12 DOCUMENT HISTORY

Impact assessments

An Equality Impact Assessment (EqIA) was completed on: 12 October 2021.

Audit trail

In the following table there is a brief audit trail, detailing amendments made to this policy/procedure.

| Page/Para nos. | Brief description of change | Date |
|-----------------------|--|----------------|
| Policy | Review of policy | September 2012 |
| Updated policy | Version 1.1 Created; Minor amendments / refresh | February 2014 |
| Published policy | Final version V2.0 | May 2014 |
| Updated document | Change of policy to procedure and review of document | October 2017 |
| Sent for consultation | Sent to SIT for consultation | April 2018 |
| Published SOP | Final version v3.0 | August 2019 |
| Review | Final version 4.0 | October 2021 |

DEFINITION OF TERMS

At incidents the IC should ensure full details are captured on Hazardous Materials Information Retrieval Board and conveyed to HMEPO/Fire Control for incident and environmental safety advice.

Read the hazard statement on the packaging and the safety data sheet from the supplier.

International symbols required by Classification, Labelling and Packaging Regulations (CLP)



Harmful to environment



Toxic



Gas under pressure



Corrosive



Explosive



Flammable



Oxidising



Long term health hazard



Irritant

Chemicals that have Workplace Exposure Limits (WELs) applied are listed in the current HSE publication EH40.

Microorganisms can be hazardous to the health of any person, these include; bacteria; viruses; fungi; and the egg and Larval stages of many parasites. Service procedure E22 – Legionnaires Disease deals with the management of water systems to prevent the proliferation of the Legionella bacteria; similarly service policy SOP E3 – Blood Borne Viruses and Diseases (HBV, HIV and HCV) details the arrangements for dealing with HIV and Hepatitis).

Substances produced during a process either as a by-product, waste, residue, fume, dust, etc. are required to have a COSHH assessment. The owner, or person responsible for production, should control these and their presence should be communicated to any member of NFRS attending any situation on the premises.

COSHH regulations do not specifically deal with asbestos or lead, nor with the radioactive or explosive properties of materials, these are dealt with in separate sets of regulations.

DCOL 4/91, quantifies “a significant risk to health” by stating that:

It is not likely to be necessary for users to notify dilute materials. Materials are likely to be of significance during an incident if they are present in large quantities, equally they may be significant, in small quantities, if they are encountered uncontained in concentrated form. If the substance can survive an immediate fire it may create a serious hazard in damping down or clearing up operations.

HSE requires employers to comply with regulations where significant quantities of the following are present in any premises:

- Hydrofluoric acid or Phenolic compounds; these may penetrate clothing
- Fluorine compounds that may break down into Fluorine acid in fire precautions
- Residue (dross) from tin processing that may liberate Arsine (the most toxic form of Arsenic) in the presence of water
- Sensitising agents such as Ethylene Diamine and Isocyanates that may cause no problems except to individuals who have developed, or are developing, a sensitivity (“May cause sensitisation by skin contact and/or inhalation”)
- Vinyl Chloride Monomer (VCM), this is a known human carcinogen and medical surveillance under is required
- Premises at which substances that are pharmacologically alive (research establishments or pharmaceutical companies)
- Laboratories and animal houses where category 3 and 4 pathogens may be present (agents that can cause severe communicable human disease for which treatment, in some cases, may not be available)