

Imperial College Union Policy Control of Substances Hazardous to Health Policy

Audience: All Staff
Owner(s): Leadership Group
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Date Approved:
Approving body:

1. Policy statement

Imperial College Union is committed to ensuring the health, safety and welfare of its members, staff, customers, suppliers, visitors and all others who may be affected by its activities.

Imperial College Union recognises that good management of health, safety and welfare is essential to the success of the organisation and is a sign of a well-managed organisation.

Imperial College Union is committed to ensuring that procedures are in place to identify hazards, assess risk and set objectives to improve the management of health, safety and welfare.

Imperial College Union acknowledges its duty to ensure that all relevant legislation regarding health, safety and welfare is adhered to and that resources are made available to ensure health, safety and welfare.

Imperial College Union is committed to developing a positive safety culture, based on the involvement of staff and volunteers in health and safety management. Imperial College Union will therefore use consultative forums and mechanisms to involve staff and volunteers in health and safety management, and will endeavour to provide relevant training to all staff and students.

Imperial College Union commits to reviewing this policy at least every 2 years, or as and when necessary, with approval for the policy to take place at the Board of Trustees.

2. Introduction

COSHH stands for 'Control of Substances Hazardous to Health' and under the Control of Substances Hazardous to Health Regulations 2002, employers need to either prevent or reduce their workers' exposure to substances that are hazardous to their health.

Chemicals are used throughout the Union, all chemicals must be handled with care. Some cause immediate problems such as burns to the skin, others long term injuries due to inhalation, skin absorption or ingestion.

Only chemicals that have been agreed with the relevant manager and College health & safety advice must be sought prior to any use. This ensures a limited number of chemicals and that are also the lowest risk.

3. Responsibilities

Board of Trustees

The Health and Safety at Work Act 1974 places a statutory duty on organisations to ensure, so far as is reasonably practicable, the safety, health and welfare of its employees at work and other people who may be affected by their activities, e.g., membership, volunteers, members of the public.

The Board of Trustees, as the governing body of the Union, has overall and final responsibility for Health and Safety matters within the Union and for ensuring that Health and Safety legislation is complied with.

The Managing Director

The Managing Director has delegated responsibility for the implementation, monitoring and review of the Health and Safety Policy and associated policies. As required by the 'Management of Health and Safety at Work Regulations 1993' the Managing Director is named as the 'competent person' who will ensure compliance with Health and Safety. In particular the MD is responsible for:

- The setting of Health and Safety standards and objectives.
- The allocation of the necessary financial resources.
- Identifying and allocating Health and Safety responsibilities to Senior Managers / Departmental Heads.

Leadership Team Lead

The Managing Director will delegate to a membership of the leadership team the following responsibility:

- Ensuring general risk assessments are undertaken and made available to all employees.
- Monitoring and reviewing the effectiveness of Health and Safety activities and the Union's Health and Safety Policy and associated policies and procedures, and for ensuring that, at the strategic level, performance standards and timescales are adhered to.
- Ensuring accidents are investigated and reported to the Board of Trustees.
- Putting in place arrangements to monitor the maintenance of the premises and equipment.
- Chairing the Students' Union's Operational Health and Safety Committee and ensuring it has the time, facilities and resources to carry out its business effectively.
- Keeping under review this Health and Safety Policy and the Health and Safety performance of the Union.

Line Managers

Health and Safety is a delegated line management responsibility requiring managers to undertake operational Health and Safety duties identified in this Policy and individual policies and procedures associated with Health and Safety. All Departmental Heads will be trained in relevant Health & Safety courses (i.e., Risk Assessment, COSHH) and where appropriate (CIEH, NEBOSH) to ensure areas/ teams are managed safely.

Line Managers are responsible for the following:

- Ensuring that departmental activities are conducted in accordance with Union policy, legislative, and other formal standards and that those hazards having the potential to cause harm are risk assessed and identified controls are implemented.
- Ensuring that employees receive sufficient information, training and supervision on Health and Safety matters.

- Producing safe systems of work and the means for complying with this Policy and other individual policies and procedures associated with Health and Safety.
- Where necessary, organising supervision to control the working environment and the maintenance of safe standards.
- Investigating accidents, or near misses, to establish causes and prevent recurrence.
- The Health and Safety induction of new staff, volunteers and students and ensuring that information, instruction and training are provided to meet individually identified needs.
- Identifying and monitoring the adequacy of the specific Health and Safety responsibilities of staff and students.
- Reviewing the above arrangements at regular intervals, making adjustments as necessary.

Individual Members of Staff, Volunteers, Students and Visitors

Individual members of staff, students and visitors have a legal duty to co-operate and comply at all times with the Health and Safety information, instruction and training provided. They must bring to the attention of their line manager or duty manager, without delay, any hazards identified, or improvements identified as necessary. Students should report hazards to the Union helpdesk or a member of Union staff.

If a hazard is seen, it should be removed or dealt with as soon as possible if it is safe to do so. It should also be reported using the Unions incident reporting system as a matter of priority.

Individual members of staff and students have a duty to take reasonable care for the Health and Safety of themselves and for other persons whom their actions or omissions may affect. Specifically, no person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare. Serious breaches of the Health and Safety Policy (e.g., misusing equipment, deliberately putting someone else's safety in danger) will be dealt with through the relevant Union Disciplinary Procedure.

Individuals must take responsibility for being aware of fire hazards, knowing the location of fire exits, the assembly point and the fire drill instructions. All new employees to the organisation will be inducted in Fire Safety and the Evacuation Procedure immediately upon commencing employment.

Health and Safety matters may also be raised by any employee at 1-2-1 meetings, team meetings and at Town Hall meetings, which occur regularly.

Operational Health and Safety Committee

The Operational Health and Safety Committee will meet at least once per term, although additional meetings may be called by the Managing Director, Officer Trustees, or the Board of Trustees should the need arise. Membership of the committee will be determined by the Managing Director.

The Committee will have the following terms of reference:

- To maintain and review the measures necessary to ensure the Health and Safety of Union employees, students and others engaged in legitimate activities on its premises.
- To set and review H&S performance and objectives to improve H&S management and maintain a positive H&S culture.
- To monitor the management processes employed within the Union to mitigate risk, notably the implementation and annual review of risk assessments.
- To monitor and review H&S related incidents, implement investigations and complete corrective action (where appropriate and necessary) in a timely manner not to exceed 6 months.

- To monitor and review the H&S audit and inspection process, both internal and external, and implement recommendations where appropriate.
- To monitor and review the adequacy and implementation of H&S related training, awareness and competency standards.
- To enable complaints and reports from employees to be investigated, remedial action to be implemented, and response provided.
- To submit an annual report to the Board of Trustees summarizing the committee's output and effectiveness.

In addition to the Operational Health and Safety Committee, the Board of Trustees may from time to time determine the need for a sub group of the Board to take on specific governance oversight of the Union's Health and Safety activity to ensure sufficient scrutiny and consideration is given to this area of work.

4. Arrangements

Risk Assessment

A risk assessment must be completed before any use of hazardous chemicals.

Standard Operating Procedures

A standard operating procedure for regular use of hazardous chemicals should be completed and signed off by the relevant Union and College authority. Staff and students must have read and subsequently follow procedure before any authorised use of hazardous substances.

Storage

All hazardous substances must be kept in secure storage. Access to the storage will be restricted to those who have completed relevant training. The Union will keep a record of all storage locations and authorised people.

Personal Protective Equipment (PPE)

The following (PPE) should be provided for use with hazardous chemicals

- Gloves/Gauntlets - are long gloves which protect arms when cleaning ovens or submerging arms in water for a long period of time, the standard required is EN374.
- Goggles - to protect eyes from chemical splashes or aerosols, standard EN166.
- Face mask - to protect the face and breathe from chemical splashes or aerosols, standard EN143.
- The correct Rubber apron EN467.
- Safety shoes - fully enclosed safety shoes are required as detailed in the COSHH assessment/risk assessment (hazardous chemicals).

5. Review

The Policy Owner is responsible for conducting a comprehensive review of their policies at a minimum of every 3 years or as required to stay current with applicable laws and/or Imperial College Policies.

The purpose of the review is to determine:

- if the policy is still necessary and accurate;

- if the policy should be combined with another policy or if it should be rescinded;
- if the policy is up to date with current laws and regulations and Imperial College policies;
- if changes are required to improve the effectiveness or clarity of the policy;

6. Training

Health and safety legislation require employers to provide adequate health and safety training. The College provides a comprehensive training programme that is available to all Union staff and postgraduate students, mostly without charge. Undergraduate training is dealt with in departments.

Staff Training

All Union employees are required to undertake essential training related to their role as part of their induction this will include relevant training related to the safe handling of hazardous substances.

COSHH Training should be completed with all users of hazardous chemicals on a 6-monthly basis.

Student Volunteers

Student volunteers will be provided with relevant health and safety training to ensure their activity is safe and that they are aware of their responsibility with the use and storage of any hazardous substances.

Building Safety Inductions

All persons entering Union space are given access to basic safety information which will be available from the Union Helpdesk and in Union spaces.