

COSHH and Hazardous Substances — Implementation Guide

Read this first.

The legal position

The Control of Substances Hazardous to Health Regulations 2002 require employers to assess the risk from substances hazardous to health, and to PREVENT exposure or, where that is not reasonably practicable, adequately CONTROL it. Regulation 7 sets a hierarchy in which personal protective equipment comes LAST, after elimination, substitution and engineering controls.

Why this matters here

Occupational lung disease and skin disease account for far more lost working days than injuries do, and they are almost entirely invisible until they are permanent. The single most common failing is reaching for a mask or a pair of gloves instead of controlling the substance.

What the law asks for

Requirement	Source	What it means here
Assess the risk before the work	COSHH 2002 reg 6	Substance by substance, task by task. Written and kept
Prevent exposure, or adequately control it	COSHH 2002 reg 7	Eliminate, substitute, engineer, then PPE last
Maintain, examine and test control measures	COSHH 2002 reg 9	LEV thorough examination and test normally at least every 14 months
Monitor exposure where required	COSHH 2002 reg 10	Where the assessment says so
Health surveillance where required	COSHH 2002 reg 11	Skin checks, lung function, records kept
Information, instruction and training	COSHH 2002 reg 12	They must know what it does and what the controls are for

The order to do it in

1. Complete the risk assessment (COS-01) for your own site. Walk it, do not just sign it.
2. Adopt the safe system of work (COS-02) and put a copy where the work happens.
3. Start the monitoring record (COS-03).
4. Deliver the training (COS-04). Your own supervisor, about an hour.
5. Test knowledge (COS-05). Candidate paper blank, answers in ink. Mark with the key.
6. Assess practically (COS-06) on your own site and equipment.
7. Authorise in writing (COS-07). The document most firms are missing.
8. Run the toolbox talks (COS-08) and keep the signed sheets.
9. Log everybody on the register (COS-09) and diary the refreshers.

Half a day of setup, then about an hour per person.

Refresher interval

There is no legally fixed interval. HSE expects refresher training at a frequency justified by risk. Three years is common practice, and sooner after any incident, near miss, new equipment or change of process.

Scope and limitations — read before use

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