

The Glasgow School of Art

GSA Control of Substances Hazardous to Health (COSHH) Procedure

March 2017

Policy Control

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1. Introduction

The Control of Substances Hazardous to Health (2002) Regulations (COSHH) impose duties on GSA to protect its staff and any other persons, whether at work or not, who may be affected by GSA's work involving substances hazardous to health. This document should be read in conjunction with GSA's Health and Safety Risk Assessment Procedure.

This guidance has been developed to assist members of staff in academic and professional support areas to implement good practice in the areas under their control in relation to the purchase, handling, use, storage and disposal of chemicals recognised as hazardous to health.

The assessment should be viewed as an essential decision making process on the control measures required to be implemented to ensure minimum exposure to hazardous chemicals is achieved. The decisions made should be based on the chemical information supplied and obtained and the reaction conditions to be applied to the hazardous chemical.

The appendices to this procedure contain further information and tools to assist in its implementation. These are:

Appendix 1: GSA COSHH Risk Assessment Flowchart

Appendix 2: Principles of Good Practice

Appendix 3: GSA COSHH Risk Assessment Form

Appendix 4: GSA COSHH Inventory Log

Appendix 5: GSA COSHH Risk Assessment Log

2. Definitions

Substance Hazardous to Health:

A substance (including a preparation)—

- (a) which is listed in Table 3.2 of part 3 of Annex VI of the CLP Regulation and for which an indication of danger specified for the substance is very toxic, toxic, harmful, corrosive or irritant
- (b) for which the Health and Safety Executive has approved a workplace exposure limit
- (c) which is a biological agent
- (d) which is dust of any kind, except dust which is a substance within paragraph (a) or (b) above, when present at a concentration in air equal to or greater than –
 - (i) 10 mg/m³, as a time-weighted average over an 8-hour period, of inhalable dust
 - (ii) 4 mg/m³, as a time-weighted average over an 8-hour period, of respirable dust
- (e) which, not being a substance falling within sub-paragraphs (a) to (d), because of its chemical or toxicological properties and the way it is used or is present at the workplace creates a risk to health

Hazard:

In relation to a substance, means the intrinsic property of that substance which has the potential to cause harm to the health of a person, and "hazardous" shall be construed accordingly

WEL:

Workplace Exposure Limits (WELs) are British occupational exposure limits and are set in order to help protect the health of workers. WELs are concentrations of hazardous substances in the air, averaged over a specified period of time, referred to as a time-weighted average (TWA). A list of these can be found here: <http://www.hse.gov.uk/pubns/priced/eh40.pdf>

LEV:

Local Exhaust Ventilation (LEV) is an engineering control system to reduce exposures to airborne contaminants such as dust, mist, fume, vapour or gas in a workplace.

RPE:

Respiratory Protective Equipment (RPE) consists of two types, respirators and breathing apparatus.

Respirators (filtering devices) use filters to remove contaminants from the air being breathed in. They can be either:

- Non-powered respirators – relying on the wearer's breathing to draw air through the filter; or
- Powered respirators – using a motor to pass air through the filter to give a supply of clean air.

Breathing apparatus needs a supply of breathing-quality air from an independent source (eg air cylinder or air compressor).

3. Roles and Responsibilities

3.1 Heads of School and Professional Support Areas

Under the GSA Occupational Health and Safety Policy, Heads of School and Professional Support areas are accountable to their respective Executive Group Member. Heads of School and Professional Support areas have responsibility to ensure that within their programmes of risk assessment there is provision for assessing and controlling hazardous substances that could result in an injury.

The regulations impose a number of duties on both employers and employees. Schools and Professional Support Areas must have measures in place to comply with the following duties in respect of work under their control:

- Assess the risk to all staff, students and visitors from hazardous substances present or produced in the workplace
- Prevent or control the exposure to hazardous substances of personnel and others
- Ensure that control measures both engineering and personal protective equipment (PPE) are properly used and maintained
- Where necessary arrange for monitoring of workplaces to ensure WEL's are not being exceeded
- Where appropriate arrange for health surveillance of staff routinely handling/using chemicals which can cause severe damage to health

3.2 Heads of Departments and Programme Leaders or their Professional Support equivalent

Within this procedure Heads of Departments and Programme Leaders or their professional support equivalent are referred to as line manager.

In order to ensure compliance with the regulations Heads of Departments, or equivalent in professional support areas, must ensure that work is not undertaken that is liable to expose any employees, or others, to any substance hazardous to health or that the exposure is kept to a minimum after a suitable and sufficient risk assessment.

3.3 Employees

All employees must:

- follow safe working practices
- use control measures including PPE properly and report defects to management
- report any accidents, incidents and/or near misses appropriately
- attend health surveillance appointments as requested

3.4 Students

Health and safety is both a collective and individual responsibility for all persons affected by the activities of GSA. Students have a duty to adhere to GSA's policies and procedures and to co-operate with GSA in occupational health and safety matters. Each person must take reasonable care of their own occupational health and safety but also that of others who may be affected by their acts or omissions.

4. COSHH Risk Assessment

Appendix 1: GSA COSHH Risk Assessment Flowchart illustrates the overall process.

A general risk assessment should be undertaken to determine if the task or activity involves the application of COSHH. GSA's Health and Safety Risk Assessment Procedure is a separate document which establishes an overarching framework for risk assessment, including COSHH risk assessment. Both regular and irregular activities associated with the task or activity should also be taken into account when carrying out the general risk assessment, as these may reveal occasional or sporadic use of hazardous substances that need to be assessed in more detail, i.e. by undertaking a, more detailed, COSHH risk assessment.

It is recommended that an activity based approach is used to complete the COSHH assessment and that the process is undertaken by personnel who have knowledge, experience and information regarding the risks associated with the activity. A COSHH Risk Assessment must be undertaken prior to work commencing.

The purpose of an assessment is to enable a valid decision to be made about measures necessary to control substances hazardous to health arising from any work. It also assures that all the factors have been considered, and that an informed and valid judgement has been reached about the risks, and the steps that need to be taken to achieve and maintain adequate control.

All COSHH Assessments should be recorded even those where the activity only involves a single chemical substance.

A full DSEAR risk assessment may be required if;

- The work activity involves the use or storage of pressurised flammable gas cylinders such as acetylene or hydrogen
- Very large quantities of flammable substances are involved, for where the recommended limits for storage of flammable substances are exceeded (50 litres for extremely or highly flammable substances and flammable liquids with a flashpoint below the maximum ambient temperature of the working area, 250 litres for other flammable liquids with a higher flashpoint of up to 55°C.)
- The work activity involves the use of explosives
- The work activity is still likely to create an explosive atmosphere even when using the controls specified above
- The work activity involves the use of flammable/oxidising/explosive substances only and not substances hazardous to health as defined by COSHH.

The COSHH assessment should:

- Consider the chemicals present, used or likely to be produced
- Identify the properties of these substances
- Identify the hazards associated with these substances
- Identify possible exposure routes by which personnel and others may come into contact with the substance
- Identify all personnel and others which may be at risk to exposure as a result of this chemical activity
- Take into personal circumstances such as pregnant women and nursing mothers and staff with known medical conditions

If risk of exposure is identified the assessment should include:

- Specified control measures put in place to minimise exposure e.g. Substitution for an alternative substance, Fume Cupboards, Local Exhaust Ventilation (LEV) and the type of Personal Protective Equipment (PPE) to be worn
- Where necessary instructions on how to use the specified control measures

See below examples of control measures by the HSE:

Substance, process	Control equipment	Way of working	Managing
<ul style="list-style-type: none"> ■ Cleaning with solvent on rag. 	<ul style="list-style-type: none"> ■ Use a rag holder. ■ Provide a small bin with a lid for used rags. 	<ul style="list-style-type: none"> ■ Avoid skin contact. ■ Reduce solvent vapour from used rags. 	<ul style="list-style-type: none"> ■ Check controls are used. ■ Safe disposal.
<ul style="list-style-type: none"> ■ Dust and sparks from abrasive wheel. 	<ul style="list-style-type: none"> ■ Put an enclosure around the wheel and extract the air to a safe place. 	<ul style="list-style-type: none"> ■ Check the airflow indicator. ■ Make sure the extraction works. 	<ul style="list-style-type: none"> ■ Maintain controls. ■ Test controls as required by law.
<ul style="list-style-type: none"> ■ Fume from cutting demolition scrap. 	<ul style="list-style-type: none"> ■ Ventilated welding helmet, gloves. ■ Washing facilities. 	<ul style="list-style-type: none"> ■ Work outdoors upwind of the fume wherever possible. ■ Allow the fume to clear before removing helmet. 	<ul style="list-style-type: none"> ■ Check if there is any lead paint on the scrap being cut. ■ Carry out health checks.
<ul style="list-style-type: none"> ■ Cutting-fluid mist from a lathe. ■ Swarf. 	<ul style="list-style-type: none"> ■ Put an enclosure around the lathe and extract the air to a safe place. ■ Protective gloves. 	<ul style="list-style-type: none"> ■ Use skin-care products. ■ Make sure the extraction works. ■ Allow time for the mist to clear from the enclosure before opening it. 	<ul style="list-style-type: none"> ■ Train workers. ■ Check and maintain fluid quality. ■ Test controls as required by law. ■ Carry out health checks.
<ul style="list-style-type: none"> ■ Dust from disc cutter on stone worktop. 	<ul style="list-style-type: none"> ■ Use an enclosure to extract air to a safe place. ■ High-efficiency vacuum cleaner. 	<ul style="list-style-type: none"> ■ Cut and polish worktops inside an enclosure. ■ Vacuum up dust. 	<ul style="list-style-type: none"> ■ Test and maintain controls. ■ Carry out health checks.

The COSHH risk assessment should also include:

- Instructions on how to make the activity safe
- Contact details of responsible person associated with the activity
- Actions to be taken in event of spills or accidental vapour/gas release
- An emergency plan in the event the above cannot be put in place

If the COSHH assessment concludes potential for significant health damage based on routine exposure to a hazardous substance:

- Personnel involved in the activity should be informed of the assessment conclusion
- Should the COSHH Risk Assessment identify a need for Occupational Hygiene e.g. air sampling, you should inform your line manager. Advice from the Health and Safety Team is available if required
- In a limited number of cases, the line Manager may need to contact Human Resources to discuss a health surveillance programme that should be implemented

The judgement as to whether health surveillance is required takes into account the quantity of the hazardous substance, the frequency of its use, the type of exposure and whether there is a reliance of PPE as a control measure. Health Surveillance is not a substitute for control measures which should be in place to minimise chemical exposure.

3.5 Record the Findings

The GSA COSHH Risk Assessment Form or an alternative online platform should be used to record the outcome of the COSHH risk assessment process.

You are not required to send copies of individual risk assessments to the Health & Safety Team. Where you are unsure if your risk assessment is suitable, or where you are dealing with complex, higher risk activities the Health and Safety Team can offer advice or feedback.

COSHH Risk assessments must be kept locally for at least three years or longer should specific legislation require it.

For further information on document retention you should also refer to the Records Retention Schedules relating to Corporate Management which can be found on the Records Management page of the GSA website: <http://www.gsa.ac.uk/about-gsa/key-information/records-management/>

3.6 Log of Risk Assessments

To help understand the risk profile and to keep a record of Hazardous Substances that have been assessed; when these need to be reviewed; and to facilitate auditing, a Log of COSHH Risk Assessments must be completed by each academic department within each School, and by each Professional Support Area (including central Research and Learning and Teaching departments).

Please see Appendix 6: GSA COSHH Risk Assessment Log.

3.7 Reviewing COSHH Assessments

The COSHH assessment is a live working document and should be reviewed regularly and modified if necessary. However, assessments should be reviewed at any time:

- If significant changes are made to existing workplaces, work activities, projects, equipment, or materials/substances in use, such that the original assessments are no longer valid.
- If new or temporary members of staff are employed who may be more at risk due to inexperience, age or physical or mental health conditions and disabilities.
- If female staff are pregnant, and their work could give rise to a health risk to the mother or unborn child.
- If new legislation, guidance, codes of practice or national standards are introduced.
- If workplace inspections, accidents or near misses highlight deficiencies in existing risk control measures or previously unforeseen hazards.

4 Sources of Information For Hazardous Substances

Information about hazardous substances can be gained from a wide variety of sources. The key sources of information about the hazardous nature of commercially produced/purchased products used in the workplace are:

4.1 Safety Data Sheets (SDS)

SDS do not in themselves constitute a risk assessment, but are merely the starting reference point for such an assessment, as the SDS only gives you information about the substance itself - you must assess the risk from use of the substance in the actual work activity, including amounts, concentrations etc.

Safety Data Sheets contain important information as to the health and safety hazards posed by chemicals/substances, required exposure control measures, first aid requirements, spillage containment, safe disposal requirements, etc. It is a legal requirement that the supplier provide these at no cost. The supplier at first supply should automatically provide them, but as this does not always happen in practice, you should ensure that you have the SDS for each hazardous substance that has been purchased by contacting the suppliers as appropriate.

The key information for a substance written in the SDS will include:

- | | |
|---|--|
| a) Identification of the substance or preparation and the company/undertaking | h) Exposure controls and personal protection |
| b) Composition/information on ingredients | i) Physical and chemical properties |
| c) Hazards identification | j) Stability and reactivity |
| d) First-aid measures | k) Toxicological information |
| e) Fire-fighting measures | l) Ecological information |
| f) Accidental release measures | m) Disposal considerations |
| g) Handling and storage | n) Transport information |
| | o) Regulatory information |
| | p) Other information |

Some generic SDS are available on databases accessible via the Internet, unless these sites are those of your actual supplier, the information should be treated with caution as the generic substance may not be identical to the substance you have, and this is particularly important where a hazardous preparation (mixture of substances) is concerned. In such case you should always obtain the dedicated product SDS from the supplier.

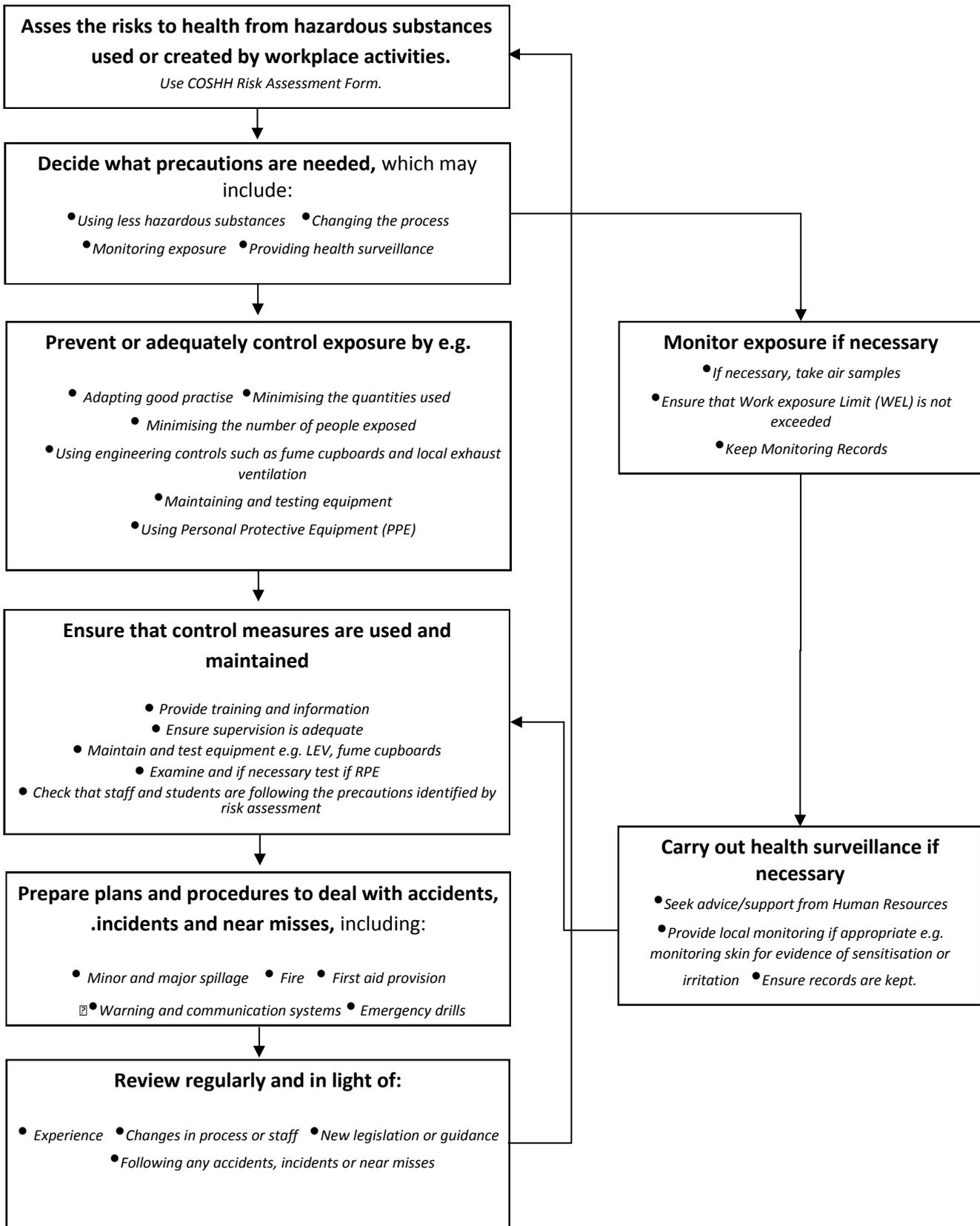
4.2 Labels

A substance/preparation label will provide basic information including warnings, safety advice and hazard symbols. Note that substances may have hazards not covered by COSHH (such as flammability) that should be included in the general risk assessment. Read the hazard statement on the packaging and the safety data sheet from the supplier. For further information on these symbols please see Appendix 3: Labelling for Hazardous Substances

4.3 Other Sources of Information

Where substances are combined also consider any intermediates or by-products that may be created – it is probable that there will be no Safety Data Sheet (SDS) available for these or the end product. A combination of non-hazardous substances may produce a hazardous result. This information may be included in the MSDS or manufacturers' instructions for the original substances, but it is unlikely. It may be necessary to consult other sources of information in order to establish the hazards. Also, consider any by-products that may be produced due to physical interaction (e.g. heating, pressure), such as fume or aerosol.

Appendix 1: GSA COSHH RISK ASSESSMENT FLOWCHART



Appendix 2: PRINCIPLES OF GOOD PRACTICE

The Approved Code of Practice: Control of Substances Hazardous to Health (L5) introduces principles of good practice to take into consideration when working with Hazardous Substances.

The principles are:

- (a) Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- (b) Take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures
- (c) Control exposure by measures that are proportionate to the health risk
- (d) Choose the most effective and reliable control options which minimize the escape and spread of substances hazardous to health
- (e) Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- (f) Check and review regularly all elements of control measures for their continuing effectiveness
- (g) Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks
- (h) Ensure that the introduction of control measures does not increase the overall risk to health and safety

Appendix 3: Labelling for Hazardous Substances

Description	Old Pictogram	New Pictogram	Hazard class and hazard category:
Exploding Bomb			Explosive (Symbol: exploding bomb)
Flame			Flammable (Symbol: flame)
Flame Over Circle			Oxidising (Symbol: flame over circle)
Gas Cylinder			Gas under pressure (Symbol: Gas cylinder)
Corrosion			Corrosive (Symbol: Corrosion)
Skull and Crossbones			Acute toxicity (Symbol: Skull and crossbones)
Exclamation Mark			Health hazard/Hazardous to the ozone layer (Symbol: Exclamation mark)
Health Hazard	 		Serious health hazard (Symbol: health hazard)
Environment			Hazardous to the environment (Symbol: Dead tree and fish)

Appendix 4: GSA COSHH RISK ASESMENT FORM

A COSHH risk assessment is required for the use of hazardous substances including source materials, intermediates, products and by-products. Guidance on completing this form is provided in the COSHH Risk Assessment Procedure.

Title of activity, project or task:					
Assessor's Name:					
Assessment No.:					
Linked References or Assessments: <i>(e.g. General RA/DSEAR)</i>					
Line Manager/ Programme Leader:					
School/Area :					
Date of assessment:					
Date of next review					
Location of work: <i>(Building/Area & Room number(s))</i>					
Section 1 Activity or Project					
1.1: Description of activity, project or task					
Section 2 Hazards					
2.1: Hazardous substances used and generated					
Hazardous Substance	Major hazardous properties <i>(tick as appropriate)</i>	Quantity	Concentration	Risk Phrases	Workplace exposure limit (WEL)
	 <input type="checkbox"/>  <input type="checkbox"/>				
	 <input type="checkbox"/>  <input type="checkbox"/>				
	 <input type="checkbox"/>  <input type="checkbox"/>				
	 <input type="checkbox"/>  <input type="checkbox"/>				
	 <input type="checkbox"/>				
Section 3 Risks					
3.1: Human diseases, illnesses or conditions associated with hazardous substances					

3.2: Potential routes of exposure <i>(select all that apply)</i>		
Inhalation <input type="checkbox"/>	Ingestion <input type="checkbox"/>	Injection <input type="checkbox"/> Absorption <input type="checkbox"/> Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		
3.3: Use of hazardous substances <i>(select all that apply)</i>		
Large scale <input type="checkbox"/>	Fieldwork <input type="checkbox"/>	Animals <input type="checkbox"/> Maintenance <input type="checkbox"/> Cleaning <input type="checkbox"/> Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		
3.4: Frequency of use		
Daily <input type="checkbox"/>	Week <input type="checkbox"/>	Monthly <input type="checkbox"/> Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		
3.5: Potential for exposure to hazardous substances		
Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>
3.6: Who might be at risk <i>(select all that apply)</i>		
Staff <input type="checkbox"/>	Students <input type="checkbox"/>	Visitors <input type="checkbox"/> Public <input type="checkbox"/> Under 18s <input type="checkbox"/> New & expectant mothers <input type="checkbox"/> Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		
3.7: Assessment of risk to human health <i>(Prior to use of controls)</i>		
Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>
Section 4 Controls to Reduce Risks as Low as Possible		
4.1: Controls <i>(select all that apply)</i>		
Workshop <input type="checkbox"/>	Studio <input type="checkbox"/>	Controlled area <input type="checkbox"/> Fume cupboard <input type="checkbox"/>
Local exhaust ventilation (LEV) <input type="checkbox"/>	Access control <input type="checkbox"/>	Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		
4.2: Other controls <i>(Specify below)</i> :		
4.3: Storage and Transport of hazardous substances <i>(Specify below)</i> :		
4.4a: Personal protective equipment (PPE) <i>(select all that apply)</i>		
Overalls <input type="checkbox"/>	Apron <input type="checkbox"/>	Spectacles <input type="checkbox"/> Goggles <input type="checkbox"/> Face shield <input type="checkbox"/> Gloves <input type="checkbox"/> Special headwear <input type="checkbox"/>
Special footwear <input type="checkbox"/>	Other <i>(Specify below)</i> <input type="checkbox"/>	
Other:		
4.4b: Describe when the above PPE will be used:		
4.5: Respiratory protective equipment (RPE) <i>(select all that apply)</i>		
Disposable mask <input type="checkbox"/>	Filter mask <input type="checkbox"/>	Half face respirator <input type="checkbox"/> Full face respirator <input type="checkbox"/> Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		
4.6: Waste disposal routes and chemical categories <i>(select all that apply)</i>		
Liquid <input type="checkbox"/>	Solid <input type="checkbox"/>	Gas <input type="checkbox"/> Inorganic <input type="checkbox"/> Organic <input type="checkbox"/> Aqueous <input type="checkbox"/> Mixed <input type="checkbox"/> Other <i>(Specify below)</i> <input type="checkbox"/>
Other:		

4.7: Monitoring exposure and Health surveillance <i>(Refer to Section 4 of the GSA COSHH Risk Assessment Procedure)</i>		
4.8: Instruction, training and supervision		
Special instructions are required to safely carry out the work <i>(If yes enter details below)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Special training is required to safely carry out the work <i>(If yes enter details below)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
A: Work may not be carried out without direct personal supervision <i>(If yes enter details below)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
B: Work may not be started without the advice and approval of line manager/ programme leader <i>(If yes enter details below)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
C: Work can be carried out without direct supervision	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Name of Line manager/ programme leader supervising the work:		
Section 5 Emergency Procedures		
5.1: Detail emergency procedures		
5.2: Minor spillage or release		
Specify procedure		
Other actions	Evacuate and secure the area	Yes <input type="checkbox"/>
	Complete Accident/Incident Report	Yes <input type="checkbox"/>
5.3: Major spillage or release		
Specify procedure		
Other actions	Evacuate building by fire alarm	Yes <input type="checkbox"/>
	Call the Fire and Rescue Service	Yes <input type="checkbox"/>
	Inform line manager/programme leader	Yes <input type="checkbox"/>
	Complete Accident/Incident Report	Yes <input type="checkbox"/>
5.4: Fire Precautions		
Carbon dioxide <input type="checkbox"/> Water <input type="checkbox"/> Powder <input type="checkbox"/> Foam <input type="checkbox"/> Fire Blanket <input type="checkbox"/> Other <i>(If yes enter details below)</i> <input type="checkbox"/>		
Other:		
5.5: First aid and details of initial response		
Remove affected clothing and wash with copious amounts of water for skin contact <input type="checkbox"/>		
Eye wash station <input type="checkbox"/> Other <i>(If yes enter details below)</i> <input type="checkbox"/>		
Other:		

5.6: Emergency contacts						
	Name	Position	Telephone			
1.						
2.						
Section 6 Overall Assessment						
6.1: Overall Assessment of risk to human health (Following use of controls)						
Low <input type="checkbox"/>		Medium <input type="checkbox"/>		High <input type="checkbox"/>		
6.2: Assessor						
Name		Signature		Date		
6.3: OVERALL RISK <i>(Based on Likelihood X Severity)</i> Use this to complete sections 3.7 and 6.1						
		SEVERITY INDEX				
		1	2	3	4	5
LIKELYHOOD	5	5-MED	10-MED	15-HIGH	20-HIGH	25 -EXTREME
	4	4-LOW	8-MED	12-HIGH	16-HIGH	20-HIGH
	3	3-LOW	6-MED	9-MED	12-HIGH	15-HIGH
	2	2-LOW	4-LOW	6-MED	8-MED	10-MED
	1	1-LOW	2-LOW	3-LOW	4-LOW	5-MED
LIKELIHOOD DESCRIPTION		RATING		SEVERITY DESCRIPTION		
Highly Probable		5		Death (R*)		
Probable		4		Specified Injury (R*)		
Possible		3		Unfit for Normal Duties for More Than 7 Days (R*)		
Unlikely		2		Unfit for Normal Duties for Less Than 7 but More Than 3 Days		
Highly Unlikely		1		Minor Injury		

Ref. no.	Name of chemical/hazardous substances <i>not yet assessed</i>	Planned date for completion of assessment	Lead Person	Comment

SIGNED: Head of Department		NAME: (Please print)		DATE:	
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This Log summarises the COSHH risk assessments that have been produced for your School, Department or Professional Support Areas. **It does not represent a COSHH risk assessment in itself.** These should be recorded separately on a GSA COSHH Risk Assessment Form together with any supporting specialist risk assessments e.g. Standard Risk Assessment, Manual Handling etc.

A copy of this Log should be maintained within the Department or Professional Support Areas.