



UNIVERSITY
OF SUSSEX

Human Resources

SAFE MANAGEMENT OF CHEMICALS, OTHER HAZARDOUS SUBSTANCES, AND THEIR WASTE

1. OVERVIEW AND PURPOSE

- 1.1 The University is a complex and diverse environment where work, research and education can include the use of chemicals, other hazardous substances, and the management of their waste.
- 1.2 This policy sets out the arrangements in place at the University to comply with all legislation concerning the management of chemicals, other hazardous substances, and their waste, and applicable codes and standards to minimise risk, reduce the impacts arising from work-related injuries and ill-health, and prevent such injuries and ill-health altogether.

2. SCOPE

- 2.1 This policy applies to all staff, students, contractors, third parties and visitors.
- 2.2 The policy applies to all activities under the University's control, which are undertaken by individuals as part of their work, research, or education, wherever they take place.
- 2.3 Third parties who undertake activities involving the use of chemicals, other hazardous substances, and their waste, on University premises are required to co-operate and co-ordinate with the University.

3. RESPONSIBILITIES

3.1 Vice-Chancellor

- 3.1.1 The Vice-Chancellor will provide leadership and executive oversight of health and safety. They are also accountable for ensuring that all work in relation to chemicals, other hazardous substances, and their waste is in compliance with the applicable health and safety Regulations and requirements.

3.2 Executive Deans of Faculty and Directors of Professional Services

- 3.2.1 Executive Deans of Faculty and Directors of Professional Services are responsible for health and safety matters relating to the activities of their Faculty or Division, whether these are undertaken on the University's premises or elsewhere, and must ensure that:
 - All chemicals and other hazardous substances purchased, stored, used, produced, disposed of, and/or transported, by their Faculty or Division are identified.

- All identified chemicals, other hazardous substances and their waste, are risk assessed and managed effectively with oversight by either the Faculty Health and Safety Committee or Campus Operations Safety Group (in the case of Divisions).
- Appropriate consideration is given to the arrangements and management of the use, handling, storage, and/or disposal of chemicals, other hazardous substances, and their waste, as it relates to projects for research, teaching, or other work activity.
- The Health, Safety and Wellbeing Team is consulted where Faculties/Divisions plan to transport dangerous goods, and that a Dangerous Goods Safety Advisor (DGSA) is appointed where required.
- Relevant information on risks associated with chemicals, other hazardous substances, and their waste, including control measures, is documented and communicated clearly and effectively.
- Training and supervision are provided to those who are required to work with chemicals, other hazardous substances, and their waste, which may require the provision of specialist training.
- Suitable and effective arrangements are in place to deal with emergencies relating to chemicals, other hazardous substances, and their waste, and that these events are reported centrally.
- Appropriate investigations are undertaken following any significant incidents, near misses, or untoward occurrences, relating to activities involving chemicals, other hazardous substances, and their waste, and that any remedial or improvement actions are implemented.
- Arrangements are in place for effective cooperation and coordination between all relevant parties where projects will involve the purchase, storage, use, production, disposal, and/or transportation of chemicals, other hazardous substances, and their waste.
- All equipment and facilities in relation to chemicals, other hazardous substances and their waste, are maintained and tested to ensure safe and effective operation, and records are maintained.

3.3 Hazardous Agents Safety Sub-Committee

- 3.3.1 The Committee provides oversight and governance of chemicals, other hazardous substances, and their waste, as is detailed in the Committee's terms of reference.
- 3.3.2 The Committee reports into the Health and Safety Committee.

3.4 Line Managers, Supervisors, Technical Managers and Principal Investigators

- 3.4.1 Line Managers, Supervisors, Technical Managers, and Principal Investigators are responsible for ensuring that they and their teams are aware of the arrangements in

place for any work or research that involves chemicals, other hazardous substances, and their waste that is under their control/ supervision. This will include ensuring that these activities are risk assessed and that control measures are put in place.

- 3.4.2 They are responsible for ensuring that all persons under their control/ supervision are fully aware of, and understand, the risks and control measures, and that they are trained and competent to carry out such activities safely, including responding to emergencies.
- 3.4.3 They are responsible for providing appropriate supervision and monitoring compliance with this policy and all local arrangements through accurate record keeping and assurance checks.

3.5 **All Staff, Students, Contractors, Third Parties and Visitors**

- 3.5.1 Every individual (staff member, student, contractor, third party and visitor) has a responsibility to:
 - Comply with all safety arrangements, including, but not limited to, following all applicable safety procedures, and wearing required Personal Protective Equipment (PPE), as identified in local operational documents.
 - Co-operate with and follow any safety instructions or directions from Line Managers, Supervisors, Technical Managers, and Principal Investigators, or safety personnel.
 - Report any accidents, incidents, or defects in work equipment through the appropriate local reporting and escalation channels.
- 3.5.2 Staff and students acting in a manner that poses a risk to their safety, or the safety of others, may be subject to improvement programmes and/or disciplinary action. Individuals who are not members of the University, deemed to be acting in such a manner, may be asked to leave the site.

4. **POLICY**

- 4.1 Risks associated with work involving chemicals, other hazardous substances and their waste should be managed, so far as is reasonably practicable, through the application of safety codes of practice, operating procedures, and guidance which sit alongside this policy (as linked at the end of the document). Control measures must be implemented in line with the hierarchy of control, as well as the assessment of significant risks presented by chemicals, other hazardous substances, and their waste, only allowing those with the necessary competence to undertake tasks involving these.
- 4.2 This policy and related supporting documents also work to ensure that the University and the Vice-Chancellor, as the accountable person, meet legal responsibilities as outlined in relevant legislation. The policy should be considered in addition to relevant UK Health & Safety legislation.
- 4.3 Compliance with all applicable legislative and statutory requirements relating to chemicals, their waste and other hazardous substances is achieved by the following:

- 4.3.1 **Transport of Dangerous Goods:** The carriage of dangerous goods, including waste, within the UK is primarily regulated by The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment (CDG) Regulations. However, transportation (especially internationally by sea and air) is also regulated by European agreements, directives and regulations such as the International Maritime Dangerous Goods (IMDG) code and the International Air Transport Association (IATA) Dangerous Goods Regulations.

All dangerous goods for transport shall be classified, marked, and packaged appropriately, and all required documentation shall be prepared and shared with those who will transport them, including third parties. Third parties used for this purpose shall be reviewed regularly to ensure they meet the requirements, and any University staff or personnel involved in the consignment of dangerous goods shall be provided with training and information and will maintain adequate documentation records.

A Dangerous Goods Safety Adviser (DGSA) shall also be appointed to monitor compliance, provide advice, and prepare an annual report on the transport of dangerous goods by the University.

- 4.3.2 **Classification, Labelling and Packaging (GBCLP):** Activities that involve repackaging, formulation, internal distribution or external supply of chemicals, other hazardous substances, and their waste shall be identified. Checks shall be conducted to ensure the classification of such substances is up to date. Safety data sheets and other relevant documentation shall be retained for these substances. Training and supervision shall be provided to those who conduct activities that involve repackaging, formulation, internal distribution, or external supply of chemicals, other hazardous substances, and their waste.

- 4.3.3 **Control of Substances Hazardous to Health (COSHH):** Chemicals and other hazardous substances shall be identified. Where an activity involves substances which are classed as hazardous to health, a Control of Substances Hazardous to Health (COSHH) risk assessment shall be conducted. Control measures shall be implemented following the hierarchy of control and principles of good control practice, details of which can be found in the supporting Safety Code of Practice.

Where substances have a workplace exposure limit assigned, control measures shall ensure this value is not exceeded, and monitoring is conducted where required to ensure that this is the case. Health surveillance shall be identified through risk assessment and put in place accordingly. COSHH risk assessments shall also identify the waste produced by a process and detail how this will be disposed of responsibly and what to do in foreseeable emergencies. All those involved in an activity, or whom may be affected by it, shall be provided with information, instruction, training, and supervision by the person responsible for the activity or work area.

- 4.3.4 **Dangerous Substances and Explosive Atmospheres (DSEAR):** Chemicals and other substances that are classed as dangerous shall be identified. Where they are present or liable to be present, a chemical analysis and suitable risk assessment shall be undertaken to ensure that measures are identified and implemented to control and mitigate the hazards. Where substances can produce flammable vapours and therefore create an explosive atmosphere, the explosive atmosphere zone (EX Zone)

shall be identified and the extent of the zone estimated. Control measures shall be implemented to remove ignition sources from the identified zone. Where ignition sources cannot be removed, electrics shall be upgraded to ATEX rated equipment. Where an EX Zone has been established, schematic drawings shall be produced and a List of Equipment for Hazardous Area Classification (LEAC). Waste and its responsible disposal shall be identified through risk assessment.

Foreseeable emergencies shall be identified and planned for, and all those involved in activities involving dangerous substances shall be provided with information, instruction, training, and supervision. Suitable arrangements for the management of high-risk activities involving dangerous substances, such as hot works, shall be implemented.

- 4.3.5 **Registration, Evaluation, Authorisation and Restriction of Chemicals (UKREACH):** Reputable suppliers of chemicals and other hazardous substances shall be used, and safety data sheets (SDS) obtained. Work, research and teaching activities involving these substances shall be COSHH risk assessed, informed by SDS exposure information. Any new hazard information or risks identified during use shall be reported to the supplier. A valid authorisation shall be held where substances listed on the authorisation list are to be used. Registration documents for substances that are imported from outside the UK shall be retained.

5. LEGISLATION AND GOOD PRACTICE

5.1 Legislation

5.1.1 Please see below for related key legislation relevant to this policy area:

- [Carriage of Dangerous Goods and Use of Transportable Pressure Equipment 2009 \(as amended\)](#)
- [Classification, Labelling and Packaging of Substances and Mixtures 2023 \(as amended\)](#)
- [The Control of Substances Hazardous to Health Regulations 2002 \(as amended\)](#)
- [The Dangerous Substances and Explosive Atmospheres Regulations 2002](#)
- [REACH \(Amendment\) Regulations 2023](#)

5.2 Codes and Standards of Practice

5.2.1 Please see below for related key codes and standards of practice relevant to this policy area:

- [HSE Carriage of Dangerous Goods \(CDG\)](#)
- [HSE Chemical Classification, Labelling and Packaging \(CLP\)](#)
- [HSE Control of Substances Hazardous to Health \(L5\)](#)

- [HSE Dangerous Substances and Explosive Atmospheres \(L138\)](#)
- [UKREACH Registration, Evaluation, Authorisation and Restriction of Chemicals](#)
- [IATA Dangerous Goods Regulations \(DGR\)](#)
- [IMO International Maritime Dangerous Goods \(IMDG\) Code](#)

Review / Contacts / References

Policy title:	Safe Management of Chemicals, Other Hazardous Substances, and their Waste
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Revision history:	V1.0 – Document created
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Related internal policies, procedures, guidance:	A to Z of health and safety: Health and Safety: Schools and services: University of Sussex University Health, Safety and Wellbeing Policy Chemical Safety and Control of Substances Hazardous to Health Classification, Labelling and Packaging of Substances and Mixtures Dangerous Substances and Explosive Atmospheres Registration, Evaluation, Authorisation and Restriction of Chemicals Transport of Dangerous Goods Health and Safety Incident Reporting System
Division:	Human Resources
Policy Owner:	Executive Director of Human Resources
Point of Contact:	Senior Safety Manager University Health, Safety and Wellbeing Team, HR