University of Sussex

Control of Hazardous Substances Policy

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1. Introduction

The University of Sussex uses a variety of substances within its estates, facilities, teaching and research activities with harmful or hazardous properties that may create a risk to human health or harm to the environment. This policy details the management arrangements and responsibilities for control of hazardous substances used at or by the University of Sussex.

2. Definition

The term ‘Hazardous Substance’ is very broad and includes chemicals, biological agents, carcinogens, dusts, flammable materials (solvents and fuels) and gases which have the potential to cause harm to human health. For the purposes of this policy it does not include asbestos, radioactive materials or lead.

3. Objectives

The objectives of this policy are:

3.1 to prevent exposure of staff, students, visitors, and contractors to hazardous substances; where this is not reasonably practicable, exposure will be adequately controlled.

3.2 to reduce the impact on the environment of hazardous substances used at or by the University by using the best practicable environmental option.

3.3 to ensure compliance with relevant legislation for the use, storage, transport and disposal of hazardous substances.

3.4 to mitigate and limit the effect of exposure to hazardous substances in emergency situations to staff, students, contractors, members of emergency services and members of the public.

4. Application

This policy applies to all University of Sussex staff (including visiting academics), students and contractors employed by the University who use hazardous substances.

This policy applies to use ‘on’ or ‘off’ University premises and in particular to staff and managers who have a duty of care placed upon them to actively monitor the implementation of this policy.
5. Policy Statement

The University will assess and adequately control the risks created by the use, storage, transport and disposal of hazardous substances.

In accordance with the above the University will:

5.1 prevent exposure to hazardous substances but where this is not reasonably practicable, exposure will be adequately controlled by:

5.1.1 substituting a less hazardous substance;

5.1.2 reducing the amount of substance used or stored;

5.1.3 the use of engineering controls;

5.1.4 managerial means; e.g. safe systems of work;

5.1.5 the use of Personal Protective Equipment;

5.2 ensure that buildings, plant, and equipment provided for the purpose of controlling hazardous substances are adequately maintained and that adequate records of such maintenance are kept;

5.3 provide appropriate health surveillance;

5.4 where practicable monitor exposure;

5.5 provide adequate training;

5.6 provide suitable and sufficient information and instruction;

5.7 provide competent supervision;

5.8 provide competent advice;

5.9 ensure that there are appropriate emergency plans, equipment, personnel and procedures in place to deal with foreseeable incidents;

5.10 ensure that hazardous substances are disposed of in the appropriate manner;

5.11 ensure that appropriate records of procurement, use and disposal are completed and maintained;

5.12 ensure that hazardous substances are packaged, stored and transported appropriately.
6. Responsibilities

6.1 The Director of Health, Safety and Environment is responsible for:

6.1.1 auditing compliance with the policy including the procurement, use, storage and disposal of hazardous substances;

6.1.2 provision of advice, training and guidance to the University, Schools and Units on compliance with this policy;

6.1.3 ensuring that the policy and guidance is current;

6.1.4 liaising with the regulatory authorities.

6.2 Deans and Directors are responsible for ensuring that:

6.2.1 hazardous substances used by their School/Unit are assessed prior to use and that exposure to any substance is prevented or where this is not reasonably practicable adequately controlled;

6.2.2 control measures for which they are responsible are maintained;

6.2.3 staff and students have sufficient instruction and information and are adequately trained and supervised;

6.2.4 that where practicable adequate arrangements are made to monitor exposure to hazardous substances;

6.2.5 staff and students who meet the criteria for health surveillance attend for health surveillance and that appropriate records are kept;

6.2.6 any recommendations made by the University Occupational Health Service are actioned and that records are kept;

6.2.7 adequate arrangements are in place where facilities are shared or where staff and students are working on premises managed by other employers;

6.2.8 adequate emergency plans and procedures are in place to deal with foreseeable incidents;

6.2.9 all hazardous substances are stored, transported, packaged and disposed of appropriately;

6.2.10 adequate resources are made available to enable compliance with this policy.
6.3 Managers and Supervisors (including academic) of staff and students must:

6.3.1 undertake a written risk assessment where hazardous substances are to be used;

6.3.2 implement any control measures identified by the assessment including any advised by Occupational Health;

6.3.3 ensure that work is only undertaken where a risk assessment has been undertaken;

6.3.4 provide adequate information, instruction, training and supervision;

6.3.5 inform the Dean/Director and School/Unit Health & Safety Advisor of any activity where the risk assessment has indicated that a hazardous substance requires control measures and provide a copy of the risk assessment if requested to do so.

6.4 Staff and Students who work with hazardous substances must:

6.4.1 comply with the appropriate risk assessment and any supplementary guidance;

6.4.2 use any protective equipment provided in the appropriate manner;

6.4.3 report any defects in the procedure, protective equipment or plant;

6.4.4 undertake any training deemed necessary;

6.4.5 undertake necessary health surveillance.

6.5 Managers and Supervisors of contractors must:

6.5.1 make contractors aware of this policy and any other factors that may affect the contractors’ assessment;

6.5.2 ensure that a written risk assessment has been undertaken where hazardous substances are to be used;

6.5.3 monitor that any control measures identified by the assessment have been implemented;
6.5.4 advise contractors of any risks to them from University activities in the areas they are working where the risk assessment has indicated a hazard;

6.6 Contractors must comply with the requirements of this policy by:

6.6.1 undertaking a written risk assessment where hazardous substances are to be used;

6.6.2 implementing any control measures, including emergency procedures, identified by the assessment;

6.6.3 provide adequate information, instruction, training and supervision to their staff.