

COSHH 2002 (as amended)	Principles of good control practice “Summary Points and Checklist” Form, April 06
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Introduction to the Principles	<p>The Principles of good control practice: Regulation 7(7) on adequate control and Schedule 2A.</p> <p>Note the requirement, (Regulations 7.1 and 7.2) first to consider prevention, process change or substitution.</p> <p>The Principles are a ‘package’. Apply them all to get effective, reliable and sustainable exposure control.</p> <p>You cannot pick and choose which Principles to apply – they are all important in getting adequate control.</p> <p>The Principles have no rank order, though there is a logical progression in how they are presented and considered. You do not need rigidly to work your way sequentially from Principle (a) to Principle (h). Apply the Principles in whatever way suits your purpose, but apply them all.</p> <p>Refer also to associated COSHH Guidance.</p>
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<p>This 'Summary Points and Checklist Form' helps you apply the Principles. Because these overlap in their application there are, at certain points, some repetition.</p> <p>Where there is clear repetition, the form will auto-complete.</p> <p>For instance, Principle (d) requires you to list the key elements in the exposure control measures and Principle (f) asks you to summarise the key ‘Hardware’ and ‘Software’ elements.</p> <p>Not all aspects of the Principles apply to every circumstance. For example, dust or vapour extraction is irrelevant where surface contamination and skin absorption are the source of exposure.</p> <p>It takes a little time to consider and apply the Principles. But you need to do this just once per process, activity or task.</p> <p>The Form helps you identify when, where and by whom further work is needed. Record what needs to be done.</p> <p>Once the Form is complete and agreed, take the findings and include them in your risk assessment.</p>
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Use the findings recorded in the Form (and any other documents) to develop simple instructions for operators, supervisors, those who check and maintain control measures and those who review the controls. Make the key findings known as clearly as possible to all those that need to know and to act. You often need different ways to tell different people the same messages.

Note	<i>The objective of COSHH is to prevent, or adequately control, exposure to substances hazardous to health.</i>
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Name of task/job/process:

Assessor:
Date:

Principle (a) Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health

Guidance points and checklist		Responses and action notes
1a	Which groups of workers are potentially exposed?	
1b	Are other groups potentially exposed, eg cleaners, maintenance workers?	
2a	What are the main and significant <u>sources</u> of exposure?	
2b	What are the main <u>substances</u> of exposure?	
2c	What <u>modes</u> of exposure - inhaled, skin contact, skin uptake, ingested?	
	For each group exposed:	
3.1	How can the number of sources be reduced?	
3.2	How can the size and/or rate of emission/release be reduced?	
3.3	Is segregation of large or diffuse sources possible? How?	
3.4	Which sources need enclosure?	
3.5	Which sources need extraction (gas, fume, vapour, mist, dust)?	
3.6	Is existing extraction <u>effective</u> - does it match the source?	
3.7	Is existing extraction applied and used properly?	
3.8	How might controls fail?	
3.9	What emergency arrangements exist for such failure?	
4.1	What is the existing work method?	
4.2	Was this work process or method designed to minimise exposure?	
4.3	How could the work method change to minimise exposure?	

Principle (b) Take into account all relevant routes of exposure – inhalation, skin and ingestion - when developing control measures

Guidance points and checklist

Responses and action notes

Guidance points and checklist		Responses and action notes
	Which routes of absorption are relevant to exposure: Which substances are relevant to exposure	0
1a	How does the contaminant get into the air to cause exposure?	
1b	How does contaminant spread through the air?	
2a	How is the contaminant released to contaminate skin?	
2b	How does the contaminant spread beyond the area of use?	
3	How might ingestion occur?	
4a	Which are the main sources of exposure? List them.	
4b	Which are the most important?	

Principle (c) Control exposure by measures that are proportionate to the health risk

Guidance points and checklist		Responses and action notes
1	What are the potential health risks - <u>long-term</u> effects?	
	Is there sufficient information to make decisions about:	
1a	Risks to health?	
1b	What exposure level will protect people's health?	
1c	Control measures likely to control the risk?	
2	What are the potential health risks - <u>short-term</u> effects?	
	Is there sufficient information to make decisions about:	
2a	Risks to health?	
2b	What exposure level will protect people's health?	
2c	Control measures likely to control the risk?	
	For the <u>contaminants or processes</u> , are there:	
3a	Workplace Exposure Limits (WELs)?	
3b	Other exposure standards?	
3c	Are these standards well-founded?	
3d	What fraction of this standard should exposure be kept below?	
3e	Is there guidance on adequate control measures? What is it?	
3f	Is health surveillance needed?	
4a	Are the controls sufficiently effective to give adequate control?	
4b	Will the proposed controls give adequate control?	
	<i>The control must meet the challenge. This depends on the size and number of sources, workplace layout, etc</i>	
5a	How often will control measures be reviewed? (at least annually)	
5b	By whom?	
5c	Next review?	

Note: Suppliers, trade/industry associations, specialist advisors, and HSE's 'Chemicals' webpages are some of the information sources that may be useful

Principle (d)	Choose the most effective and reliable control options that minimise the escape and spread of substances hazardous to health
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Key questions: When can a control option be applied? How much will it reduce exposure? How reliable will it be?

Guidance points and checklist		Responses and action notes
1	Can the process be modified or the material replaced so as to prevent exposure? (<i>Regulation 7.1</i>)	
2a	How did you select the people to develop the control measures?	
2b	Did they have the right knowledge, skill and experience?	
	Can you make modifications to reduce emission and/or spread:	
3a	Process modifications?	
3b	Material modifications?	
3c	Workplace modifications?	
4a	Can you enclose the process to limit emission or spread?	
4b	Can you use extraction or suppression to limit emission or spread?	
4c	List the controls. Include supervision.	
5	Confirm the criteria for PPE selection as a control solution	
6	How do the work methods contribute to exposure control?	
7	How do the controls integrate into an effective set of measures?	

Note: There is a hierarchy of control reliability often linked to effectiveness. Address the most significant sources first - see Principle A

Principle (e)	Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment (PPE) including respiratory protective equipment (RPE)
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Note: If needed, as an element in a set of control measures, PPE usage must be managed within a programme.

Guidance points and checklist		Responses and action notes
1a	Is PPE is required, in addition to other control options?	
1b	List type(s) of RPE and the degree of protection required	
1c	List type(s) of other PPE and the performance required	
2	Is PPE currently provided adequate to deal with the hazard?	
3	Is all PPE suitable for the wearer and work environment?	
4a	Does RPE fit properly? Has fit-testing been done?	
4b	Does other PPE fit?	
5	Do wearers find it reasonably comfortable over the whole exposure period?	
6	Have supervisors and wearers been trained to use RPE and other PPE properly?	
7	Are the storage arrangements adequate?	
8a	Is the PPE checked? Are the checks frequent enough?	
8b	Who does the checking?	
8c	Date of next check?	
9a	What are the arrangements for thorough examination and test of RPE and other PPE?	
9b	Who does this examination and test?	
9c	Where are the records kept?	

Principle (f)	Check and review regularly all elements of control measures for their continuing effectiveness
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Note I	<i>If you understand the characteristics and effectiveness of the control measures, focus on checking and maintaining them.</i>
Note II	<i>If the characteristics and effectiveness of the control measures are unclear, check that exposure is adequately controlled.</i>
Note III	<i>The frequency and thoroughness of checking should relate to the likelihood that a control will break down, and the consequences for health if it does break down.</i>

Guidance points and checklist		Responses and action notes
	List all the elements in your set of control measures in (rough) order of importance:	
1a	'Hardware controls' such as process equipment, applied controls such as extraction, and PPE	
1b	'Software controls' such as instructions on methods of working, supervision and health surveillance	
2	Are you confident that the control measures will effectively, reliably and adequately control exposure?	
3a	How do you detect significant change? List the checks.	
3b	How often should the checks be made?	
3c	Is there a programme of regular checks?	
3d	What records are kept?	
4a	What basic checks will be done each day?	
4b	Who does these checks?	
4c	What records are kept?	
5a	Do <u>qualitative</u> checks show adequate control?	
5b	Do <u>quantitative</u> checks show adequate control?	
5c	Do you use the results of checks to change what checks you make or how often you make them?	

Qualitative tests - eg observation, settled dust, odour, dust lamp, smoke tests, dye tracking

Quantitative tests - eg air sampling, biological monitoring, surface or skin wipes, air speed measurements, process criteria

Principle (g)	Inform, train all employees on the hazards and risks from hazardous substances, and how to use the control measures to minimise those risks
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Note: People need knowledge and understanding to motivate action, and confidence that measures work to assure their use.

Guidance points and checklist

Responses and action notes

	Guidance points and checklist	Responses and action notes
	Training and instruction on health risks.	
1a	Is this clear, concise, accessible and interesting?	
1b	How do you check that trainees understand what they are being told?	
	Training and instruction on how control measures work.	
2a	Is this clear, concise, accessible and interesting?	
2b	How do you check that trainees understand what they are being told?	
2c	How do you check that they put the training into practice?	
3a	Are the control measures designed so that workers can use them easily?	
3b	Were workers on the process involved in developing the control measures?	
3c	Do they have confidence in the control measures?	
3d	Do they continue to use the control measures properly?	

Note: Where control measures involve methods of working or affect the organisation of work, involve workers to make sure the proposed measures are workable

Principle (h)	Ensure that the introduction of measures to control exposure does not increase the overall risk to health and safety
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Guidance points and checklist		Responses and action notes
	How could the application of new control measures affect other risk elements:	
1a	What risks to health?	
1b	How to minimise these risks?	
2a	What risks to safety?	
2b	How to minimise these risks?	
3a	What risks to the environment?	
3b	How to minimise these risks?	

Action

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