

COSHH Policies and Procedures

COSHH Regulations require employers to prevent their employees being exposed to hazardous substances, where reasonably practicable to do so. Where exposure cannot be prevented the risks must be assessed and measures put in place to prevent harm.

Control measures will include:

- Informing colleagues of the hazards and associated risks to which they are exposed
- Training colleagues in the proper storage, handling and use of hazardous substances and emergency procedure to be followed
- Wearing appropriate personal protective equipment and training employees how to wear it correctly and hot to take care of it

Colleagues, as well as employers, have responsibilities under the regulations. They must co-operate with the policy / instructions given to reduce the risks from hazardous substances, and act sensibly, using equipment properly, in order to protect themselves and others.

Employees COSHH Responsibilities

Line Manager

Responsible for ensuring that the Company policy and procedures are implemented in each site, and that:

- All site colleagues are trained in the safe use of cleaning products and other hazardous substances and that records are kept of all training carried out.
- The COSHH Product Assessments are completed.
- COSHH signage is displayed.
- The correct Personal Protective Equipment (PPE) is available in each site, stored properly, and in good condition.

Site/Unit Manager

Responsible for implementing and for ensuring that:

- All colleagues are trained in the safe handling and use of hazardous substances and cleaning products before using them, referring to the COSHH Product Assessments, Task Cards, Product Labels, manufacturer training and any other appropriate guidance provided by the manufacturer.
- All colleagues complete Working Safely Training, Hazardous Substances training or any other approved Company Health and Safety Training including COSHH / safety with chemicals.
- All training is recorded on each colleague's training record, dated and signed for.
- All colleagues are aware of their responsibilities.
- The COSHH Product Assessments are completed and held on file.
- Safety Data Sheets are available for all chemical products or other hazardous substances in use that are NOT standard products on the Compass-Ecolab Approved Product List.
- Hazardous substances and cleaning products are being used safely, and in accordance with manufacturer's instructions, Safety Data Sheets, COSHH Product Assessments, Task Cards, supplier guidance and product label information as appropriate.
- Correct Personal Protective Equipment is available, used when required, stored properly and in good condition.



Colleagues

Colleagues are responsible for:

- Using all hazardous substances and cleaning products in a safe manner in accordance with training and instructions provided.
- Wearing personal protective equipment (PPE) wherever required.
- Taking care of equipment or items provided for safety purposes.
- Reporting any problems with PPE, hazardous substances or cleaning products to the Site Manager.
- Reporting to the Site Manager any ill health effects that they believe, or suspect may be caused by contact with hazardous substances or cleaning products.
- Following the first-aid, accident reporting and hazard reporting procedures.
- Co-operating with and following all the requirements of the Company in relation to COSHH.

Elimination, Substitution and Control of Substances

The Company has worked with its nominated cleaning product suppliers to establish the most appropriate cleaning products for specific cleaning tasks. Safety has been a factor in this selection process to ensure that the least hazardous products are available.

However, in commercial situations, some products do have to contain hazardous substances to be particularly efficient in cleaning processes. Where use cannot be avoided by elimination or by substitution with a non-hazardous product, then assessments have to be undertaken to control the associated risks.

Workplace Exposure Limits (WEL's)

A number of commonly used hazardous substances have been assigned a Workplace Exposure Limit (WEL) by the Health and Safety Executive.

A WEL is the maximum concentration of airborne substance averaged over a reference period, to which colleagues may be exposed by inhalation. If colleagues are exposed to the inhalation of airborne substances above the WEL, their health may be at risk.

• Cleaning products supplied by our nominated suppliers are not assigned a WEL. However, some cleaning products (e.g. destainers, machine dish wash detergents) do contain ingredients with an assigned WEL.

Prolonged Skin Contact

Prolonged skin contact with many products can affect the skin and can cause conditions such as occupational dermatitis.

Further comprehensive information about occupational dermatitis and linked guidance documents can be found on the Occupational Health page of this website.

Personal sensitivity to products can vary. Protective gloves should be worn when required by the COSHH Product Assessments. Even if they are not specifically required, it is always good practice to wear protective gloves when handling hazardous substances. However, using gloves constantly, i.e. during periods where they are not required or recommended, can exacerbate skin problems.

Goggles should be worn when there is a significant risk of splashing concentrated products into the eyes.

Where colleagues show any signs of skin sensitivity to products, they must stop using them and report this to their Site Manager. The Site Manager must follow the HSE Department Guidance on Occupational Dermatitis available on the HSE website under Occupational Health section.



Safety Data Sheets (SDS)

Suppliers of hazardous products are required to provide Safety Data Sheets (SDS). The SDS will provide information on the hazardous properties of the substances being used, any health effects associated with its use, how likely it is to get into the air or onto the skin, and what risk reduction measures should be used to control exposure to an acceptable level. It will provide essential information for satisfactory completion of the COSHH Product Assessments.

SDS are updated whenever there is any significant change made to product or for changes in the law.

Following the introduction of Ecolab products into the Compass business during 2014 and the updating of the COSHH Product Assessment process and documents, a copy of a SDS for every Ecolab product in use is no longer required to be held on each site. However, in certain sites, it may be a contractual Client requirement to have an SDS. These can often be downloaded from the manufacturer's websites – see link below:

Ecolab Safety Data Sheet Website

Once in the website, use the search facility to locate the Safety Data Sheet you require.

In the event of an accident involving a chemical and the injured person is taken to hospital, the doctors will have access to a National Database to find out what the product concerned contains in order to give the appropriate treatment.

Hazard Warning Symbols

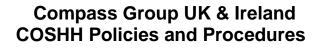
Chemical packaging and labeling regulations require a hazard classification of a product to be shown on its product label.

- Hazardous products are identified by warning symbols/pictograms in the shape of a diamond with a distinctive red border and white background.
- Some products may not have a hazard classification (e.g. Greaselift: Ready to Use);
- Products that have a hazard classification are likely to display one or more of the following symbols:



Hazardous to the Environment

A "Signal Word" such as "Warning" (less severe hazard) or "Danger" (more severe hazard) will be written next to the symbol, depending on the severity of the hazard, together with precautionary statements.





COSHH Poster

This poster is for use in all Compass units where products are used that fall within the Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH). This means any product you use in your unit/contract that has a COSHH designation (current symbols are below).

It can be displayed in a number of ways for example:

- COSHH storage areas.
- COSHH cupboards.
- Unit HSE Notice Boards.
- Adjacent to chemical dispensing areas.

A vinyl adhesive A4 version is available from Linney My store under HSE/Signage (HSE_HSE_MISC_008367). You can also download it from the Chemical Safety page on HSE Website.

Product Labels

Chemical products should be labelled to provide the following information:

- The COSHH Hazard Symbol(s)/ Hazard Pictogram.
- Instructions for storage, handling and use.

It is important to refer to the product label information before using and during colleagues' training.

Storage of Products

Products must be stored securely and safely. This means separate from food, equipment, sundries and PPE, in a lockable storeroom or cupboard. If a dedicated lockable storeroom or cupboard has not been made available for storage of products, then the room containing the storage area must be secure from unauthorized access when not occupied.

- Product containers should be inspected for damage or leaks on receipt and when being stored.
- Product containers should be stored in an upright position and the more hazardous products stored at lower shelving levels.
- Where it is stated on the product label, products should be stored in well ventilated store cupboards or storerooms to allow for the dispersal of chemical fumes in the event of leakage or accidental spillage. Some products, if mixed together, can produce extremely hazardous fumes.
- Products should be stored in their original containers, with labels legible and intact. Products should not be decanted into other containers, unless being used in purpose designed and labelled applicators (e.g. spray bottles or powder shakers).

Handling and Use

Products must not under any circumstances be mixed together prior to use or during use.

Products must not be decanted into other containers apart from applicators designed for purpose and in accordance with manufacturer/supplier instructions for application. Such applicators may include spray bottles for dilute application of hard surface cleaners and powder shakers for dry powder application of sanitisers.

All such containers must be labelled with:

- Name of the product.
- Instructions for use.



- Safety information.
- Most labels and pre-labelled empty containers (shakers and spray bottles) will be available from the supplier. Otherwise, blank labels must be used and filled in with ALL the information as detailed above.
- Concentrated products should be dispensed or poured carefully in the correct amount into the sink, bucket or other equipment where it is to be used. Install mechanical measuring and dosing equipment where available from the supplier.
- Concentrated products should be dispensed into water, not the water into the concentrated product.
- Spray or foam attachments should be used only for those containers designed for such use, where the product is intended to be used undiluted. Use only those attachments provided by the supplier.
- Spray heads should be examined for leaks or other faults each time they are used and should be turned to the 'off' position when not in use.
- Flammable products must not be used near naked flames, where ignition sparks can be generated or other places that can result in explosive atmospheres.
- Wash hands after using any product.

Personal Protective Equipment (PPE)

The following PPE may be required in connection with storage, handling and use of hazardous substances and products:

Personal Protective Equipment	Protection Given
Gloves/Gauntlets	Skin Protection
Face Masks/Respirators	Skin Protection/Inhalation Protection
Goggles	Eye Protection
Aprons/Overalls	Skin Protection

- PPE must provide adequate protection from harm and must comply with safety specifications& standards;
- The COSHH Product Assessment must state the PPE required where it is a necessary safety precaution. This is also included on Task Cards and should be repeated on cleaning schedules and in training programmes to remind employees of the precautions that need to be taken.

COSHH Training

- COSHH training must be carried out in line with Company policy as specified in the Site Managers responsibilities at the beginning of this section
- Training to include safety precautions, storage, handling, use, PPE, emergency procedures (spillages etc), fire precautions, first-aid measures, product knowledge, cleaning processes, COSHH symbols/ hazard pictograms

Sources of Training Materials and Information

- Manufacturer/supplier Safety Data Sheets, product information sheets, product labels, training guidance sheets;
- COSHH Product Assessments;
- Task Cards;
- Company health and safety training programmes or other approved COSHH training;
- COSHH posters and COSHH safety signage;
- COSHH-essentials guidance sheets.



Compass Group COSHH Documentation Policy

This section explains the requirement to assess risks associated with hazardous substances and sets out the Company policy and procedures for completing the assessments and associated documentation.

COSHH Product Assessments

An important duty imposed by the regulations is the requirement to assess the risks to health arising from the use of hazardous substances in the workplace and decide what precautions are needed. Exposure to hazardous substances must be prevented where reasonably practicable. If this is not possible, then risks must be adequately controlled.

The COSHH Product Assessment is a record for each product and details the name of the product, the manufacturer, the use of the product, the hazard classification, the risk phrase(s) and the safety precautions to be taken, including the wearing of PPE where applicable.

Although some products are classified as non-hazardous and don't require any PPE to be worn, it is Compass policy that the appropriate protective gloves are worn whenever chemicals or cleaning products are being handled or used to prevent prolonged or repeated exposure of the skin.

COSHH Product Assessment procedures involve the completion and/or retention of the following documents:

- COSHH Product Inventory;
- COSHH Product Assessments;
- Task Cards;
- Safety Data Sheets for non-Ecolab products only, or where it is a Client requirement to hold them.

The COSHH Product Inventory is used to list all substances and products used and/or stored in a site/unit. For each product listed on the inventory form you must also show that the COSHH Product Assessments and Task Cards have been downloaded and reviewed, and that the Safety Data Sheet is available where this is required.

Before you begin, please complete the COSHH Product Inventory Form for your site/contract. Please refer to the worked example for guidance. Both Documents can be downloaded from the COSHH Home page on the HSE website.

COSHH Product Assessments must be updated/reviewed every 3 years or sooner if there are any changes to the product or its use and after any accident involving the product.

The completed assessments must be retained in a secure place for at least 6 years.

COSHH Product Assessments - Company approved products

The format of the COSHH Product Assessments (CPAs) for each product have been prepared using the information on the most recent Material Safety Data Sheets (MSDS), the layout of which is prescribed by legislation. Unless you are contractually required to do so, you DO NOT need to download and keep a paper copy of any Material Safety Data Sheets.

- Download all CPAs that are relevant to your unit/site, review and understand them.
- There is one CPA for each chemical, except for some products, e.g. Solid Power XL & Solid Protect, Toprinse & Toprinse Jet, Trump Hydro Special & Trump XL Special, where due to the same hazard, PPE and first aid



specifications, CPAs for those chemicals have been merged.

- On the left-hand side of each CPA, the "Activity Time per Shift" and "Frequency of Use or Task" have nominally been completed for you based on Ecolab's experience. If how they are used in your unit/site differs from this, please amend the CPA and initial and date the amendment.
- Safely file the CPAs where they are accessible to everyone and inform all colleagues where they are kept.

Task Cards - Company Approved Products

- Download all Task Cards that are relevant to your unit/site, review and understand them.
- Where several products are used in the same way (e.g. Apex Manual, Apex Ultra, Apex Metal, Apex Rinse, Apex Pre-Soak and Apex Pot and Pan) a single task card will apply to the procedure for all of them.
- The Task Cards all indicate the new hazard pictograms that may be on the product labels as well as the correct PPE that should be worn when completing each task, which are based on the new COSHH classifications.
- The Task Cards should be used as the main materials for training colleagues in each task.
- Safely file the Task Cards where they are accessible to everyone and inform all colleagues where they are kept.

Company approved cleaning products are delivered to Compass Group UK & Ireland sites by the appointed national distributor.

Site/Unit Manager`s COSHH Responsibilities

- To download the COSHH Product Assessments for the products in use, taking care to ensure that that the correct product assessment is used where different products of a similar name are available to download, e.g. Oasis Pro 16 & Oasis Pro 20.
- To check the "Activity Time per Shift" and "Frequency of Use or Task" and amend if necessary.
- To communicate the details on COSHH Product Assessments and Task Cards are to all colleagues involved in the handling and use of the products, in particular ensuring that they are aware of the hazard warning, risk phrases, safety precautions and PPE requirements.
- To train all colleagues involved in handling and using products are trained in the correct storage and use of the product, using manufacturer's guidance where provided.

The COSHH Product Assessments and Task Cards for some of the non-Ecolab cleaning and other chemical products from the following manufacturers are available to download from the HSE website:

- Diversey
- Coffee Machine Cleaning Products
- Rational (Cleaning products for Rational ovens)
- Miscellaneous

Completing COSHH Product Assessments - Non-Ecolab Products

- Where non-Ecolab products are in use, e.g. produced by other manufacturers and supplied by the Client company etc., COSHH Product Assessments must be completed in full by the Site Manager using the blank COSHH Product Assessment Template form provided and with the assistance of the Business Sector HSE Manager.
- In addition to cleaning products, COSHH Product Assessments must be completed for other hazardous substances e.g. paints and thinners, herbicides and insecticides, which may be used in carrying out contracted services.
- To be able to satisfactorily complete the COSHH Product Assessment, the Safety Data Sheet will be required, which must be attached to the completed COSHH Product Assessment. This can be obtained from the supplier or the manufacturer. In many cases these can be downloaded from their website.
- The Safety Data Sheet you download and use to complete your COSHH Product Assessment MUST be compliant with new EU Classification, Labelling & Packaging Regulations. If the Safety Data Sheet is dated after



(IRC Shall 1st June 2015 it should be compliant. If it is dated before this date, please contact your Business Sector HSE Manager before you proceed any further.

- COSHH Product Assessments must be completed before the product is used
- COSHH Product Assessments must be agreed by your Business Sector HSE Manager before the product is used.
- Safely file the CPAs where they are accessible to everyone and inform all colleagues where they are kept.

Go to the HSE website – COSHH homepage to download a copy of a COSHH Product Assessment Template.

Data required for completion of the COSHH Product Assessment

Please also refer to other completed COSHH Product Assessments to help you to complete your own:

What is Required	Where to Find the Information
What is the name of the product?	As shown on the product label and Section 1 of the Safety Data Sheet.
What is the product used for?	As shown on the Safety Data Sheet product label or product information sheet/user instructions
Insert hazard classification pictogram in concentrate form and diluted form, if applicable. What is the signal word?	See section 2 of the Safety Data Sheet and hazard pictogram on the product label e.g. Warning, Danger, not a hazardous substance or mixture
What are the hazard statements?	See section 2 of the Safety Data Sheet, e.g. causes severe burns, damaging to the eyes etc.
What is the activity time per shift, who are the users, what is the frequency of use or task, who will be exposed and are there any susceptible workers?	Complete as per site specific conditions
Does the product need to be diluted to use?	Put an X in the "Yes" or "No" box as applicable and what the dilution factor is e.g. 30 ml in 5 liters of water
How to prepare/apply product? How to dilute/mix/use product?	Write your own step by step procedure in the rows using manufacturer's guidance for product preparation/dilution/application.
How long is the product used for at any one time?	Write in the box how long the product is usually used for at any one time, e.g. 10 minutes, 30 minutes, 1 hour etc.
What PPE is required?	Describe what PPE is required when the product is handled in diluted and concentrated form. Insert appropriate PPE symbols.
What is the first aid Information?	See Section 4 of the Safety Data Sheet. There may be different requirements for the exposure to concentrated and diluted product.
Firefighting media	See Section 5 of the Safety Data Sheet.
Are there any Special Handling Requirement?	See Section 7 of the Safety Data Sheet.
What Accidental Release Measures should be taken in the event of spillages?	See Section 6 of the Safety Data Sheet



Completing COSHH Task Cards - Non-Ecolab Products

- Where non-Ecolab products are in use, e.g. produced by other manufacturers and supplied by the Client's company, etc. in addition to completing COSHH Product Assessments, COSHH Task Cards must be prepared in full for each task the product is used for. This should be done by the Site Manager using the blank COSHH Task Card Template form provided and with the assistance of the Business Sector HSE Manager
- Please refer to other completed COSHH Task Cards to help you to complete your own
- In addition to cleaning products, COSHH Task Cards must be completed for other hazardous substances e.g. paints and thinners, herbicides and insecticides, which may be used in carrying out contracted services
- To be able to satisfactorily complete the COSHH Task Card, the COSHH Product Assessment (and the Safety Data Sheet) will be required, which must be attached to the completed COSHH Product Assessment. You will have already downloaded the Safety Data Sheet to complete the COSHH Product Assessment
- COSHH Task Cards must be completed before the product is used
- COSHH Task Cards must be agreed by your Business Sector HSE Manager before the product is used
- The Task Cards should be used as the main materials for training colleagues in each task.
- Safely file the Task Cards where they are accessible to everyone and inform all colleagues where they are kept.

You can download a copy of a blank COSHH Task Card Template as well as the Compass Ecolab PPE, Symbol and Image Deck from the COSHH Home page on the HSE website.

COSHH Expiration Dates and Disposal

Sanitisers and disinfectants may lose some efficiency after their expiry date, however, they will still be safe to use.

All other COSHH items **<u>should not</u>** be used after their expiry date and should be disposed of in accordance with their COSHH assessment, Safety Data Sheet (SDS) and in accordance with waste legislation and Compass mandatory requirements.

Many of our Ecolab products are intrinsically low risk and can be diluted and safely disposed of down the drain: however the COSHH assessment and Safety Data Sheet (SDS) must be reviewed for each product in question. This is only recommended where small volumes of waste chemicals are being disposed of. Bulk stock should be collected by an approved waste carrier.

Full guidance for the disposal of COSHH and other Hazardous waste can be found in the Climate New Zero Toolkit.

All hazardous waste streams must be stored and separately collected by an appointed waste contractor (do not put in the general waste).

Hazardous waste includes but is not limited to:

- Fuel oils
- Electrical equipment (WEEE Waste)
- Refrigeration Equipment and F-Gas
- Florescent tubes
- Aerosols
- Batteries
- Clinical waste

Where Compass manages the disposal of hazardous waste you must receive a fully and correctly completed copy of the hazardous Waste Consignment Note (WCN) for each hazardous waste collection. WCNs for hazardous waste collection are not held centrally and must be retained on site for 3 years as a legal requirement.

Note that the disposal of hazardous waste is not part of the standard waste contract and must be paid for by the contract.

Our preferred waste contractor is Suez, their services can be accessed through your Foodbuy Account Manager.