

FIRE SERVICES EXAMINATIONS BOARD

STUDY NOTE

EXAMINATION	LEADING FIREFIGHTERS EXAMINATION
PAPER	HUMAN RESOURCE MANAGEMENT
SUBJECT	HEALTH, SAFETY AND WELFARE
ITEM	COSHH
STUDY NOTE No.	1314

INTRODUCTION TO THE STUDY NOTE

This study note has been prepared as the basis of study in connection with the qualifying examinations for promotion.

Candidates will be expected to demonstrate knowledge of the information contained in the study note and understand how it should be applied.

The 'References' made at the end of the Study Note are included for information only and candidates will not be expected to study these as part of the bibliography.

HEALTH, SAFETY AND WELFARE

1. Introduction

The regulations are designed to protect people against risks to their health from substances hazardous to health from a work activity.

The regulations impose duties on employers for the protection of employees who may be exposed to substances hazardous to health at work and of other persons who may be affected by such work.

The Control of Substances Hazardous to Health Regulations 1999 (COSHH) place various responsibilities on fire authorities, as employers, in connection with the exposure of firefighters to substances that are hazardous to health.

2. The COSHH Regulations 1999

(a) Selection

The COSHH Regulations require fire authorities, as employers of fire brigade personnel, to adopt a scheme for controlling the exposure of firefighters to any substance hazardous to health. These regulations will have a direct bearing on the way that fire brigades carry out operational risk inspections at all premises where substances hazardous to health are stored, used, processed or evolved.

It should be noted that there are certain premises where hazardous substances not caught by the COSHH Regulations are used eg. radioactive materials. However, the inspection process applied to such premises would in almost all respects be the same as that carried out for COSHH premises.

There should be a system for making COSHH assessments in appropriate cases and if operational risk inspections provide information it is obvious that in terms of efficiency there should be an inter flow of information between the systems.

Hazardous substances have always been an important part of the operational risk inspection selection process. Consequently, COSHH is not expected significantly to increase the number of premises selected for inspection. In the main the impact on the operational risk inspection process will be to formalise these procedures together with the results of the assessment procedure that the occupier should carry out.

The vast majority of hazardous substances can be dealt with using standard fire brigade procedures and equipment. A small proportion do require special operational considerations, but, it is likely that fire brigades will already be aware of premises holding these substances and have the procedures and equipment necessary to deal with any incident.

Fire brigades will become aware of premises that hold substances hazardous to health from the same sources that exist at present. In addition, COSHH will generate information from holders of these substances and from other organisations eg HSE.

Many substances fall within the definition of "hazardous" under COSHH. This fact alone does not necessarily mean that all premises where they are held merit inspection.

Personnel who have received training in hazardous materials procedures or are otherwise suitably qualified should make an assessment, based on a variety of factors, to determine if there is justification for making an inspection. Some factors to be considered are:

- (i) The amount stored, and/or processed;
- (ii) The type of storage, and/or processing;
- (iii) The likely consequences of combination with and reaction to other chemicals that may be present, including those not coming under the COSHH Regulations;
- (iv) Whether standard fire brigade procedures are adequate to deal with an incident; and
- (v) Whether there would be any serious adverse effects on fire brigade protective clothing.

(b) Inspection

An effective system of communicating information must be established between Fire Safety Officers and Fire Stations, and vice versa, to ensure that useful information relating to substances hazardous to health is made available.

Within premises, the onus is upon the employer (occupier), who, after making an assessment of the risk, may have to initiate safety rules and provide protective clothing. However, this does not remove from the fire authority certain responsibilities with regard to their personnel, such as:

- (i) Co-operating with the employer;
- (ii) Instructing personnel to comply with any local safety procedures;
- (iii) Familiarising personnel with the premises and pre-planning;
- (iv) Advising personnel of any additional precautions that may be necessary;
- (v) Providing any necessary supplementary protective clothing; and
- (vi) Safety and welfare procedures if exposed to a hazardous substance.

Personnel should be able to recognise and be aware of the risks from exposure to a hazardous substance, as well as the need to withdraw from the area if there is a possibility of exposure.

(c) Pre-planning

There are a number of points to be considered in relation to COSHH when determining pre-planning for operational incidents:

- (i) The desirability of specialist advice being readily available at any incident at premises where the COSHH Regulations apply;
- (ii) Arrangements for the mobilisation of any additional support likely to be needed;
- (iii) Arrangements for the occupier to provide additional protective clothing and/or equipment; and
- (iv) The provision of medical advice and records.

It is clearly not possible to pre-plan for every type of incident that brigades may be called upon to attend. Instead, brigades rely on well tried and tested procedures, sound equipment, and a system of command and control that is flexible and responsive. That basis, combined with the experience of crews and officers, and their ability to quickly assimilate technical and scientific information and apply it in a practical manner, should ensure that brigades can deal effectively and efficiently with the full range of incidents they attend. Underpinning this are two essential elements which are inherent in all fire brigade activities – training and the safety of personnel.

It is a defence in any proceedings arising out of the COSHH Regulations to demonstrate that a brigade has taken all reasonable practicable precautions and exercised all due diligence to comply with the Regulations.

(d) Records

There are dangers in providing too detailed information about the risk presented by a substance hazardous to health, particularly chemical data. A format that provides information of a general nature is more likely to be of real value to crews on initial attendance, as opposed to one that gives detailed information on the physical properties of a wide range of chemicals.

Where a particular substance is the subject of detailed pre-planning because of the nature of the hazard it presents and the amount held, it would be appropriate for crews on the initial attendance to have access to any available plan. The need to devise such a plan should be recognised at an early stage and it should be put into operation without delay. However, there should still remain a record, independent of detailed planning, containing simple and straightforward information that would be used by crews on initial attendance, at any type of incident.

(e) Training

If there is a possible danger of firefighters being exposed to substances hazardous to health during any practical training sessions that are being considered, then an assessment must be made of the risk and any necessary action taken prior to such training taking place.

The COSHH Regulations require that where exposure to a hazardous substance can be prevented, it should be prevented. This requirement has considerable implications for fire service training. Therefore, it is essential to consider:

- (i) Whether those undergoing training should be exposed to a hazardous substance,
- (ii) The benefits which will ensue from the training will outweigh any risk that arises from the use of the hazardous substance.

Brigades already provide training using equipment and procedures appropriate for incidents involving hazardous materials. However, where an assessment indicates an unusual hazard, the brigade may have to develop a specific training programme.

The use of specialist hazardous materials officers is an accepted practice in most brigades and they can play an important part in the development and training for incidents involving substances hazardous to health.

(f) Evaluation

Premises where substances hazardous to health are used tend to undergo frequent changes, such as:

- The amount of material stored;
- The processes used;
- The plant layout is often changed; and
- It is difficult to keep records up to date.

This reinforces the importance of records being kept as simple and relevant as possible.

The occupier has to continually monitor the risks present at the premises, an obligation which will be of value to the fire brigade. It would be appropriate for liaison with the occupier to be maintained at local level by the nearest station.

The general advice given on the need for flexible and responsive up-dating system is crucial to the aim of providing reliable and accurate records.

Advancements in protective clothing and safety equipment which brigades may implement should be considered against the pre-planning provisions.

Evaluation will be affected from time to time by changes to the levels given under the maximum exposure limits and the occupational exposure standards set by HSE. Brigades will need to be alert to such changes and modify their operational plans or equipment accordingly.

Many brigades will have officers who have been trained to advise on the operational implications of hazardous materials, and the advice of these officers should be sought.

References

Fire Service Circular 16/1989
Scottish Fire Service Circular 11/1989