COSHH - Inspection proforma

You may find the inspection proforma used for this project useful in auditing your COSHH assessments or a sample of them. To use it you will need to consider assessments together with other documents including:

- Workplace monitoring reports (where appropriate)
- Health surveillance reports (where appropriate)
- Local exhaust ventilation thorough examination and maintenance records
- Maintenance and cleaning schedules
- Staff training records

Use of the proforma

Using the information in your assessment, work through the assessment proforma. Depending upon the work task, and the substances involved, not all of the questions will be appropriate. Where questions are appropriate to the task/assessment a positive or 'correct' answer is 'yes' on the proforma. The more 'no's' are recorded, the less your compliance with the requirements of the Regulations is likely to be.

At the end of each section, there are prompts to summarise findings, clearly identifying any shortcomings and proposing corrective action. Please note that you may require the assistance of an occupational hygiene specialist, occupational health specialist or ventilation engineer, particularly with respect to carrying out environmental monitoring, health surveillance and thorough examination of equipment. Your local inspector should be able to advise you about this. Also note that 'COSHH Essentials' can be used and will lead to appropriate controls for all classes of substance.

1. Assessment (Regulation 6)		Yes/No
Consideration of hazard:		
Does the assessment detail:		
	the hazardous properties of the substance?	
Notes	*Some of this information can be found on the data sheet for the product, but you may have to consider other hazards such as intermediate substances in a reaction or by-products that may be produced in the process.*	
	health effects resulting from exposure to the substance?	
Notes	*Again, some of this information should be available on the data sheet for the product. Other sources of information regarding the health effects of hazardous substances are trade associations, the manufacturer or other companies with similar processes.*	
Range of activities:		
Are different work activities considered that may be carried out involving the hazardous substance?		
Notes	*The assessment should take into account all of the different work activities that provide an opportunity for exposure to the hazardous substance, including routine and maintenance activities.*	
Exposure:		
Does the assessment consider:		
	how employees are being exposed *(skin exposure, respiratory, ingestion)*?	
Notes	*The assessment should demonstrate that these potential routes of exposure have been considered, and where they are relevant, how they have been controlled.*	
	who is being exposed?	
Notes	*Single or multiple exposures? Have all people who may be exposed been considered in the assessment?*	
	how long they are exposed for?	
Notes	*It should consider exposure times for all people identified as being exposed, and demonstrate control measures are in place.*	
Is the potential for greater levels of exposure (for example during maintenance procedures) considered in the assessment?		

Notes	*This may be addressed by a separate assessment or procedure (such as 'permit to work'). Where this is the case, the COSHH assessment should reference the relevant documents.*	
Does the assessment adequately consider the control measures in place?:		
	Is work place exposure monitoring appropriate?	
Notes	*You should consider the COSHH hierarchy of control when making this decision, taking into consideration the nature of the hazard and opportunity for exposure. For example, monitoring may be appropriate if the hazardous substance involved has a MEL and it is being used in an open system, and you are relying upon control measures such as local exhaust ventilation.*	
	Do the results of exposure monitoring exercises feed back into the assessment?	
Notes	*Work place exposure monitoring results should stimulate control measures (or further control measures) to be considered in the assessment if they indicate that sufficient control is not being achieved.*	
	Are the effects of control measures such as LEV considered?	
Notes	*Your COSHH assessment should include an analysis of the residual risk after control measures such as LEV have been implemented. If the risk is still not adequately controlled, further control measures should be considered.*	
Are synergistic effects of exposure to multiple hazardous substances considered (where appropriate)?		
Notes	*This is only applicable in certain scenarios when exposure to two or more substances can have an additive or synergistic effect. This applies to some solvents for example.*	
Is the risk assessment reviewed, and are systems in place to ensure that it is reviewed in the event of changes in work practices or if there is reason to suspect that the assessment is no longer valid?		
Conclusions	*How far does the assessment comply with the requirements of Regulation 6 detailed above? Make a list of the shortfalls and comprise a time dated action plan to address the shortfalls.*	

2. Control of Exposure (Regulation 7)		Yes/No
Has all that is reasonably practicable been done not to use the hazardous substance, or substitute it for a substance less hazardous?		
Notes	*Use the guidance provided in the COSHH hierarchy of control.*	
Has all that is reasonably practicable been done to reduce the duration of exposure to the hazardous substance?		
Notes	*Use the guidance provided in the COSHH hierarchy of control.*	
Engineering controls:		
Is the process enclosed as far as reasonably practicable?		
Notes	*Could the process be further enclosed?*	
Has full consideration been given to whether LEV should be installed?		
Notes	*Consider the hierarchy of control – is there a significant residual risk after removing, substituting or enclosing the substance. If so, LEV, i.e. the next level of the hierarchy should be considered*	
Where installed, has the LEV system been properly designed to take into account the working practices of employees and the requirements of the process?		
Does the system appear to be appropriate? *E.g. are the extraction points appropriately placed etc?*		
Notes	*Essentially, does the LEV appear to be effective – for example: are LEV hoods positioned in the right places, do employees use different methods that may reduce the effectiveness of LEV systems?*	
Has full consideration been given to whether RPE/PPE is required to address any residual risk?		
If so, is it appropriate for use with this substance/process?		
Have face fit tests been carried out to ensure that appropriate PPE is provided?		
Notes	*Where it is not reasonably practicable to eliminate the risk and the higher priority control measures from the hierarchy don't provide adequate control then RPE should be used. Equipment should be suitable for the application – solvent protection would be different to dust protection for example.* *Face fit tests should be carried out by a competent person (as defined in the COSHH Regulations).*	
Does the process involve a carcinogen? (If not, move to section 3)		

Notes	*This should be identified on the material safety data sheet (risk phrases R45 & R49 refer).*	
Has all that is reasonably practicable been done to totally enclose the process?		
Notes	*If the material is a carcinogen you are expected to take more extensive measures.*	
Is eating drinking and smoking prohibited in these work areas?		
Notes	*Eating and drinking may provide an exposure route (ingestion) and should therefore be prohibited.*	
Is there a schedule of regular cleaning?		
Is the area clean?		
Notes	*A cleaning schedule should ensure the area is maintained in a clean state and should be carried out at appropriate intervals.*	
Are areas where carcinogens are used designated with suitable warning signs?		
Conclusions	*How far does the assessment comply with the requirements of Regulation 7 detailed above? Make a list of the shortfalls and comprise a time dated action plan to address the shortfalls.*	

3. Maintenance Examination and Testing (Regulation 9)			**Yes/No**
LEV systems:			
	Are LEV systems thoroughly examined at least every 14 months by a competent person? Are they also maintained regularly?		
	Do the LEV systems appear to be well maintained? *E.g. clear extraction points, good extraction velocity etc?*		
Notes		*A competent person should decide how frequently a system should be thoroughly examined. This can vary according to the materials being extracted and may be required more frequently than 14 monthly.*	
		Is there an identification system in place to fully identify all LEV on site?	
		Is this evident on the plant? *Are ID tags visible for example?*	
Notes		*All LEV should be easily identifiable in order to ensure that it has been appropriately maintained and thoroughly examined.*	
		Are records kept and available?	

Notes		*All maintenance and thorough examination records should be kept and available.*	
	Are systems in place to ensure that LEV is used when there is potential for exposure to the substance?		
Notes		*For example: interlocking between an initiator of the process and the extraction system to ensure that the process cannot be carried out unless the extraction is switched on.*	
PPE/RPE inspection and maintenance:			
	Is all appropriate PPE/RPE maintained?		
	Does PPE appear to be in good condition?		
Notes		*RPE maintenance and filter replacement should be carried out at appropriate time intervals.*	
	Is PPE/RPE inspected regularly?		
		Is there a system in place to ensure that this is done?	
		Are records of inspections kept?	
Notes		*An inspection schedule should be in place to ensure this is done, with clearly identified personnel with responsibilities for carrying out the inspections and maintaining records.*	
		Is defective equipment repaired/replaced as appropriate?	
EMM Conclusions		*How far does the assessment comply with the requirements of Regulation 9 detailed above? Make a list of the shortfalls and comprise a time dated action plan to address the shortfalls.*	

4. Monitoring (Regulation 10)		**Yes/No**
Is environmental monitoring appropriate?		
If monitoring is not being carried out, have the company justified why?		
Notes	*Monitoring may be appropriate for open or semi open processes where there are opportunities for personnel to be exposed to the hazardous substance. You should also consider the extent of the hazard posed by exposure. Monitoring provides a justification that your control measures are properly working.*	
Is monitoring revisited if there is a change in work procedures/conditions?		
EMM Conclusions	*How far does the assessment comply with the requirements of Regulation 10 detailed above? Make a list of the shortfalls and comprise a time dated action plan to address the shortfalls.*	

5. Health Surveillance (Regulation 11)		Yes/No
Has full consideration been given to whether health surveillance is appropriate?		
Notes	*Answer this question using your judgement after considering the potential for exposure of personnel and the extent of the hazard. Also consider whether any of the specified substances in Schedule 6 of COSHH are involved.*	
Are the results of health surveillance used to review the COSHH assessment?		
Notes	*Health surveillance results should initiate a review of your control measures if they indicate that adequate control is not being achieved.*	
EMM Conclusions	*How far does the assessment comply with the requirements of Regulation 11 detailed above? Make a list of the shortfalls and comprise a time dated action plan to address the shortfalls.*	

6. Information Instruction and Training (Regulation 12)			Yes/No
Staff training:			
	Have any specific training requirements associated with activities involving the hazardous substance been considered?		
		with respect to engineering controls being used?	
Notes		*For example, the proper positioning and operation of LEV system.*	
		with respect to PPE/RPE being used?	
		with respect to safe systems of work being used?	
		Is all of the above confirmed by speaking to employees?	
Notes		*Do work procedures that are involved in controlling exposure require specific staff training?*	
	Are records of training kept and refresher training provided as and when appropriate?		
EMM Conclusions		*How far does the assessment comply with the requirements of Regulation 12 detailed above? Make a list of the shortfalls and comprise a time dated action plan to address the shortfalls.*	

Items in black are issues that can be closed out by inspection of the premises.