

### 1. INTRODUCTION

Scaffolding contractors have a duty under the Control of Substances Hazardous to Health Regulations 2002 (COSHH) to carry out a suitable and sufficient assessment on all substances that are intended for use.

This simple guide enables a responsible person to understand the legislation and guidance and implement a safe system of work (or/and to engage a specialist for items outside his/her competency).

The first step is to identify ALL the substances that you may use or be exposed to in your office, yard, transport, and on site. Below is a list of products which you could be exposed to, but there may be others:

- Diesel;
- Petrol;
- Adlube;
- Paints;
- Thinners;
- Hydraulic Oil;
- Penetrating Oil;
- Resin (chemical ties);
- Cleaning chemicals (e.g. bleach); and
- Dust.

Please note that some items – such as Dust – are only produced because of your work operations (e.g. cutting scaffold boards on a machine in the yard).

Once all the substances have been identified, then all Safety Data Sheets (SDS), which are produced by the manufacturer and supplier, should be collected together.

*NOTE:* the term “Material Safety Data Sheets” (MSDS) is being replaced by the term “Safety Data Sheets” (SDS) and for simplicity SDS will be used throughout this guidance document.

These Safety Data Sheets will form the basis of the COSHH assessments (but please remember you are assessing the activity being carried out *using* the substance and not just the substance alone). In other words, you are producing an assessment for the **process**. A way for other managers to assist is for them to complete a request form for each substance, using the NASC template in the appendices and on the website, and pass this on to the assessor. The assessor can then devise a suitable and sufficient assessment for that substance.

For instance, you may be producing a COSHH assessment for your company’s operatives painting with paints and thinners, using a brush. Spraying the paint creates additional hazards and risks and a different assessment will have to be produced for that process.

**NOTE:** the Safety Data Sheets are an integral part of the evaluation process and should be kept in the COSHH Assessments' file for reference and record purposes.

The following guidance gives practical assistance to the small scaffolding contractor about to start the business (and a reminder to the larger contractor, which may have some of these processes in place).<sup>1</sup>

## 2. WHAT YOU NEED TO DO

Where you use something which might cause harm, you must assess the risk to health and put in place measures to control those risks.

This section will help you carry out the assessment. It will help you decide whether your controls are adequate and what changes, if any, you need to make.

As a scaffold contractor, you are likely to have four main areas of work to consider:

- **The Yard** (e.g. adlube, penetrating oil, paints, thinners);
- **Transport** (e.g. hydraulic oil, diesel, petrol);
- **Scaffolding Operations on Sites** (e.g. chemical ties); and
- **Office premises** (e.g. items such as bleach).



First of all find out information about the substances you use and produce an inventory/register (please see appendices and the NASC website for the template). The contents and hazards of the substance must be indicated on the package or label. The supplier must also provide accurate and complete Safety Data Sheets (SDS). Always consider the risk of dust (concrete and wood) to your employees' health and others.

Exceptions to this Safety Data Sheet (SDS) list are items such as dust, which is as previously discussed the result of a process and can pose a risk to your employees' health and others.



**NOTE:** Scaffold operations as a rule does not create much dust, but you may have to assess the risk of drilling into concrete and where you place operatives to work on sites which produce a large amount of dust (or if you use machines to cut wood in the yard for instance).

Once you have the full list of substances, then, as a responsible person, you must arrange for:

- a competent manager (internal or external) to carry out an assessment to:
  - Identify the hazards of each substance and/or process;
  - Evaluate the risk to employees;
  - Identify the control measures required to safeguard your employees (which must be communicated to your workforce),
- Implement the control measures required,
- Carry out monitoring and supervision to ensure compliance, and
- Monitor and periodically review the assessments.

<sup>1</sup> Please note that the NASC wish to thank the HSE for the use of their guidance document/website in the preparation of this NASC Guidance.

### Good Practice:

A scaffold contractor has collected the Safety Data Sheet (SDS) on penetrating oil, used to service fittings, and from that MSDS a competent person has developed a COSHH Assessment (for Scaffolders handling fittings).

This assessment details the hazards and the risks of oil penetrating Scaffolders' skin while handling fittings and sought a suitable alternative and now uses vegetable oil instead.

### 3. NEW COSHH CLP SYMBOLS (AND NASC ASSISTANCE)

The old CHIP Symbols are being replaced by CLP Symbols because the law on chemical classification and labelling has recently changed. It is important to note that Assessments should be completed in line with the symbols contained within the Safety Data Sheet (SDS) supplied by the manufacturer (i.e. if SDS are received with the old symbols this should be replicated in the COSHH Assessment and not updated with new CLP symbols).

This is due to the fact the new symbols are not a "like for like" update of the old symbols and it is safest to follow the detail provided by the manufacturers.

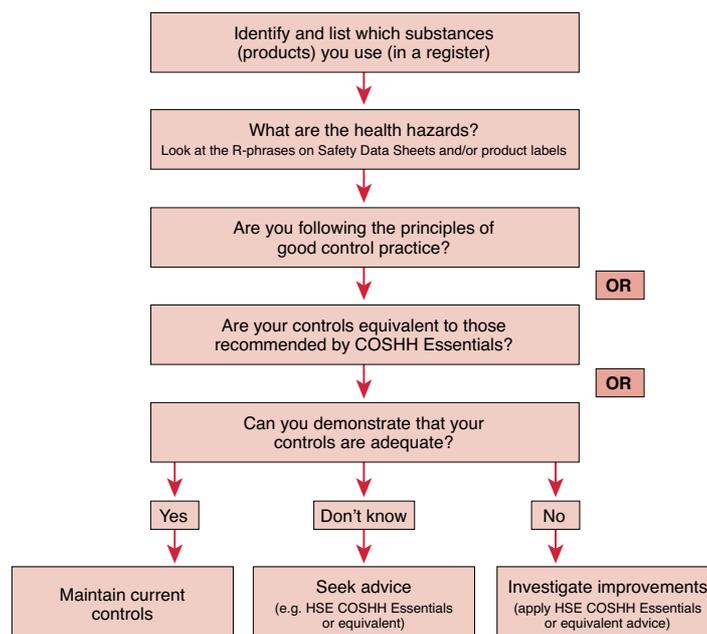
NASC have produced documents to assist Scaffold Contractors and these can be found in the Appendices and on the NASC website:

- Blank COSHH Assessment Record Form (New CLP Symbols);
- Blank COSHH Assessment Record Form (Old CHIP Symbols);
- COSHH Assessment Request Form; and
- COSHH Inventory Register.

*NOTE:* the NASC have also included a blank COSHH assessment form with the old CHIP Symbols to ensure that assessments can be completed for SDS received with the old symbols.

### 4. ARE YOUR CONTROLS ADEQUATE?

There are various ways of deciding. Probably the simplest way is to use this flowchart.



## Health Surveillance

For many harmful substances and processes there is guidance available on good control practice from trade and industry associations (which for the NASC is this Safety Guidance) and suppliers, as well as the HSE website.

You may also be able to use the simple step-by-step advice from HSE's COSHH essentials, which is freely available on HSE's website <[www.coshh-essentials.org.uk/](http://www.coshh-essentials.org.uk/)>.

You may be required to carry out an assessment to establish the likelihood that ill health can be caused by the substances within your workplace.

### 5. CARRY OUT AN ASSESSMENT

From your list of substances, you will then have to consider:

- the hazards of substances – read their labels and Safety Data Sheets. If in doubt contact your supplier.

*NOTE:* Please note that some hazardous substances can be produced by the process you use (e.g. producing wood dust from cutting scaffold boards).

- the route into the body (inhaled, swallowed or taken in through the skin) and the result of exposure by each of these routes;
- the concentration or conditions likely to cause ill health;
- persons who could be exposed; and
- the first symptoms of over-exposure and whether exposure could result in ill-health effects (e.g. dermatitis or asthma):



*NOTE:* Do not overlook maintenance workers, contractors, visitors and members of the public.

- if persons could be exposed accidentally (e.g. whilst cleaning, through spillage or if your controls fail);
- how often people work with, or are exposed to, the substance; and
- how much people work with the substance, and for how long.

### 6. CONTROL MEASURES

#### Questions to ask yourself/organisation

Do you really need to use a particular substance? Can you use a safer material or change the process to avoid its use? If not, you must provide adequate control measures. This term 'control measures' means any measure taken to reduce exposure. This includes:

- Changing the process to reduce the risks to your employees;
- Containment of the substance;
- Introducing/using safe systems of work (e.g. simple procedure written down and briefed to operatives or pinned up on the walls by machines or issued as a toolbox talk);
- Clearing (e.g. spillage kits in place ready to use and correct training to operatives on their use);
- Ventilation (e.g. working outside, windows open) to minimise the risk to all operatives, visitors and members of the public; and
- Personal Protective Equipment (PPE) and/or Respiratory Protective Equipment (RPE) (please remember that PPE/RPE is always the last resort).

You may need more than one control measure. Use the combination which will be most effective and reliable.

You will also need to supervise and monitor that your controls measures are still working effectively.

## 7. CHANGE THE PROCESS TO REDUCE THE RISKS

Look carefully at the process and decide if you need to reduce the risks – possibilities include the following:

- Reduce the amount of chemicals on site – e.g. only keep the minimum in the yard which is needed;
- Manage and prevent the risk of leakage to minimise the risk of pollution and ill health;
- Reduce the number of persons exposed; and
- Reduce the length of time persons are exposed for.

*NOTE:* for more complex scenarios the following could also be considered:

- Use pellets instead of powders as they produce less dust.

## 8. CONTAINMENT

This is often applicable for spray booths for instance (which require more specialist advice), but as general advice please consider the following:

- Enclose the process or activity as much as possible to minimise the escape or release of the harmful substance (but please note that spraying can create more risk and therefore more controls may be required and therefore for most small scaffold contractors only consider the use of spraying and spray booths as a last resort); and
- Use closed transfer and handling systems and minimise handling of materials.

## 9. SYSTEMS OF WORK TO REDUCE EXPOSURE

Consider Safe Systems of Work to reduce exposure, by planning the storage and process, for example:

- Plan the storage of materials – for instance, store chemicals in a safe place – preferably locked – with warning signage displayed, ensuring that there is no risk of storing incompatible materials (e.g. acids and caustics). For more complex materials read and adhere to Safety Data Sheet storage instructions.



- Use appropriate containers (ideally the original containers with warning signs);
- If you are required to use other containers, please ensure that these are correctly labelled and are the correct containers for the substances;
- Only store the minimum required for your operational needs on site; and
- Plan the storage of the substances and for the disposal of any hazardous waste.

## 10. CLEANING

Reduce the risks by ensuring that the work area is kept suitably clean, by planning how you intend to clean the work area and when, including the following:

- Plan and organise the workplace so that it is easily and effectively cleaned;
- Have the correct equipment to hand to clean up safely any spillages quickly and safely;
- Clean regularly using a 'dust free' method – vacuum, don't sweep. If you have to sweep consider using water to damp down the dust particles; and
- Have smooth work surfaces to allow easy cleaning where practicable (e.g. if you have a concrete floor consider installing a proprietary rubber paint floor).

## 11. LOCAL EXHAUST VENTILATION (LEV)

If you are considering introducing a machine to cut scaffold boards within your yard, for instance, you should consider installing a robust local exhaust ventilation (LEV) system to reduce risk to yard employees, and this will involve a COSHH Assessment and additional controls.

*NOTE:* LEV requires annual inspections (approximately every 14 months) by a competent person.

An effective extraction system will:

- be usable by the worker;
- enclose the process as much as possible;
- be powerful enough to capture or contain the harmful substance;
- be positioned to receive the harmful substance from the process;
- filter and discharge the air to a safe place;
- be robust enough to withstand the process and work environment; and
- received correct testing to ensure it works safely.

Common errors in applying extraction are:

- the effectiveness of small hoods is usually overestimated – be realistic;
- the hood is usually too far away from the process;
- the hood doesn't surround the process enough;
- inadequate airflow;
- failure to check that the extraction works correctly and safely; and
- workers are not consulted, extraction gets in the way and is therefore unusable.

## 12. GENERAL VENTILATION

Many scaffolding yards are usually outdoors, so there is a great deal of fresh air, but for the yards/premises which are contained (e.g. warehouses), employers should ensure all such workplaces have an adequate supply of fresh air:

- General ventilation can mean using suitable fans to blow air into the workroom (or doors and windows opened in an enclosed yard/warehouse);
- Adequate Airflow to internal work areas (e.g. doors and windows to be kept open if safe to do so).

## 13. WELFARE FACILITIES

It is important to have good welfare facilities for your employees to ensure they reduce the risk of contamination. For instance,

- In your own premises, provide good washing and changing facilities;
- On site, use the client's welfare facilities; and
- It is recommended that the operatives are briefed and encouraged to use barrier cream and to use the appropriate cleaning products (e.g. these can be generally be found in skin hygiene centres within toilet areas on large sites, provided by the main contractor and the NASC recommend scaffolding companies install similar products on the premises they control).

*NOTE:* Please refer to NASC guidance on Welfare, SG18, especially in situations where the client is not providing suitable welfare facilities.

Respiratory Protective Equipment (RPE) and/or Personal Protective Equipment (PPE) and suitable protective clothing can provide some protection, but must be considered a last resort (and please note that PPE/ RPE must be kept in good condition and replaced when required).

For instance,

- Where adequate control of exposure cannot be achieved by other means, provide personal protective clothing and equipment, in combination with other control measures (e.g. operatives are given suitable gloves when using diesel, given appropriate dust masks for certain operations as per the risk assessment).

*NOTE:* please see references for further information about dust hazards and controls and please note that face fit tests must be arranged for wearing RPE, including dust masks.

- REMEMBER don't assume PPE and/or RPE is the only control measure available (and remember that PPE/RPE is the last resort). It is not as reliable or effective as other measures.

## 15. MAINTAIN CONTROLS

All elements of your control measures must be checked and reviewed regularly to make sure they continue to be effective. These checks should be adequate to determine whether improvements are required and will include:

- Maintaining plant and equipment – all ventilation equipment must be examined and tested regularly by a competent person. This may involve measuring the air speed or the pressures in the system, or air sampling in the workroom. In general, all LEV must be examined and tested every 14 months;
- Making sure systems of work are being followed and revising them if they are not working; and
- Making sure PPE/RPE is suitable for the task, properly fitted and maintained.

*NOTE:* for more complex COSHH operations, health surveillance may be required for workers.

You may need advice, particularly for potentially serious risks and/or difficult to control processes from someone who is competent in that area of work (e.g. an occupational hygienist). Visit the website of the *British Occupational Health Society*: <[www.bohs.org.uk](http://www.bohs.org.uk)> for more information.

## 16. SIMPLE CHECKS TO CONTROL DUST

Scaffold operations as a rule does not create much dust, but you may have to assess the risk of drilling into concrete and when you place operatives to work on sites which produce a great deal of dust or if you are using machines, which create dust (e.g. wood cutting).

Fine dust is invisible in normal lighting, but is potentially harmful. Please see suggested investigation method (when using dust extraction machines):

(You can make it visible with a 'dust lamp'. Any bright torch will do. Observe the dust/mist by looking down the beam towards the torch.)

- Note the settlement and spread of contamination on surfaces;
- Check the gauge or tell-tale indicator on the extraction system;
- Check for damage and leakage from the process; and
- Speak to the operator and encourage reporting of any defects.

*NOTE:* Please see the HSE and British Safety Industry Federation's Campaign, Clean Air? Take Care! in references.

## 17. WORKPLACE EXPOSURE LIMITS

As well as following the principles of good practice for the control of exposure to substances hazardous to health, you need to be aware that, for many substances, limits have been set on the amounts of substances that workers are permitted to breathe (and check that your assessment is correct).

*NOTE:* for many scaffold contractors this may not be an issue, but it is important that the issue is understood and specialist advice sought if required.

These limits are known as workplace exposure limits (WELs). They are listed in HSE's booklet EH40 Workplace exposure limits. If the substance is known to cause cancer or asthma (check the label/Safety Data Sheet), you must control exposure to as low a level as reasonably practicable.

On completion of COSHH Assessment, the competent person should consider the exposure limits.

## 18. INFORMATION AND TRAINING

On completion of your assessment, you should brief your workers on:

- the hazards;
- how they could be affected;
- what must be done to keep themselves and others safe (e.g. how the risks are to be controlled);
- how to use control measures, including personal protective equipment and the correct systems of work along with training;
- how to monitor and assess (and who to report to when operations go wrong);
- the results of any exposure monitoring or health surveillance; and
- about emergency procedures.

## 19. RECORD THE FINDINGS

The assessments should be recorded, as should most other actions taken under COSHH. In practice, most scaffolding companies will use a limited range of materials and the usage will be very similar from site to site. It is therefore recommended that example assessments are produced which, once adapted to ensure they are site specific, may be re-used in different workplaces and on different sites.

*NOTE:* The NASC has placed a blank COSHH form in appendices (and on the website) which you may use.

Thus, once an assessment has been made for a particular group of oil-based paints, this will be valid and will apply in most subsequent situations when the paints are in use. An original assessment, if carefully prepared, may be taken to cover all similar applications of wood treatment materials. Once the general assessment has been prepared, it may be used in similar cases on each site or yard, but only when a competent person judges that it is suitable and sufficient (i.e. that the general assessment applies to the particular work).

If it does not, a specific assessment will be required. This is analogous to the use of “standard solutions” for scaffolding and falsework – if the standard doesn’t apply, a special design is required before proceeding.

## 20. REVIEW AND REVISE

COSHH requires that you periodically review your assessments where “there is reason to suspect that it is no longer valid:

or there has been a significant change in the matters to which it relates”. You should also remember that the implementation of any control measures will not themselves ensure adequate control unless their effectiveness is reviewed.

## 21. REFERENCES

*British Occupational Health Society:* <[www.bohs.org.uk](http://www.bohs.org.uk)>;

COSHH Regulations 2002;

COSHH L5 Approved Code of Practice and Guidance (ACOP);

COSHH Section of HSE Website: <[www.hse.gov.uk/coshh/index.htm](http://www.hse.gov.uk/coshh/index.htm)>;

Government Website for Legislation: <[www.hse.gov.uk/legislation](http://www.hse.gov.uk/legislation)>;

HSE and British Safety Industry Federation's Campaign: **Clean Air? Take Care:**

<<http://www.bsif.co.uk/clean-air-take-care->>;

HSE Website (CLP Symbols): <<http://www.hse.gov.uk/coshh/detail/coshh-clp-reach.htm>>;

HSE Website (COSHH Essentials): <[www.coshh-essentials.org.uk/](http://www.coshh-essentials.org.uk/)>;

HSE's booklet: EH40 Workplace exposure limits;

HSE Website (Safety Data Sheets):

<<http://www.hse.gov.uk/chemical-classification/labelling-packaging/safety-data-sheets.htm>>;

HSE welfare for employers' booklet;

The REACH Enforcement Regulations 2008 [NOTE: this does not usually directly affect scaffold contractors].

## **Appendices**

Appendix A – Blank COSHH Assessment Record Form (New CLP Symbols)<sup>2</sup>

Appendix B – Blank COSHH Assessment Record Form (Old CHIP Symbols)

Appendix C – COSHH Assessment Request Form

Appendix D – COSHH Inventory Register

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<sup>2</sup> *NOTE:* Assessments should be completed in line with the symbols contained within the Safety Data Sheet supplied by the manufacturer (i.e. if MSDS are received with the old symbols this should be replicated in the COSHH Assessment and not updated with new symbols).

This is due to the fact the new symbols are not a "like for like" update of the old symbols and it is safest to follow the detail provided by the manufacturers.

**APPENDICES**

**Appendix A – Blank COSHH Assessment Form (New CLP Symbols)**

COSHH Risk Assessment Record										Ref:							
Project/Premises:										Company:							
Substance/Material:										Hazardous Contents:							
																	
Explosive		Acute Toxicity		Respiratory sensitiser & other hazards		Corrosive		Harmful Skin Irritation		Flammable		Harmful to the Environment					
No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes				
Process:										Activity:							
Location																	
Frequency of exposure										Duration of exposure							
Risk To Health																	
Control Measures																	
Storage										Disposal							
Spillage										Fire Information							
<b>First Aid</b>																	
Eye Contact:										Inhalation:							
Skin Contact:										Ingestion:							
Other Controls		Monitoring						Health Surveillance									
Tick applicable <input checked="" type="checkbox"/>		Record Attached		Not Applicable		Record Attached		Not Applicable		Record Attached		Not Applicable					
<b>Training/Instruction Required</b>																	
Verbal Instruction (please delete one)				Yes	No	Written Instruction (please delete one)				Yes	No						
Tool Box Talk (please delete one)				Yes	No	Specialist Training (please delete one)				Yes	No						
Assessed by:										Position:				Date:			

## Appendix B – Blank COSHH Assessment Form (Old CHIP Symbols)<sup>3</sup>

COSHH Risk Assessment Record						Ref:											
Project/Premises:								Company:									
Substance/Material:								Hazardous Contents:									
																	
Biological		Toxic		Harmful <small>(Title: "Harmful" added to symbol above)</small>		Corrosive		Irritant <small>(Title: "Irritant" added to symbol above)</small>		Flammable		Dangerous to Environment					
No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes				
Process:								Activity:									
Location																	
Frequency of exposure								Duration of exposure									
Risk To Health																	
Control Measures																	
Storage								Disposal									
Spillage								Fire Information									
<b>First Aid</b>																	
Eye Contact:								Inhalation:									
Skin Contact:								Ingestion:									
Other Controls		Monitoring						Health Surveillance									
Tick applicable <input checked="" type="checkbox"/>		Record Attached		<input type="checkbox"/>		Not Applicable		<input type="checkbox"/>		Record Attached		<input type="checkbox"/>		Not Applicable		<input type="checkbox"/>	
<b>Training/Instruction Required</b>																	
Verbal Instruction (please delete one)				Yes		No		Written Instruction (please delete one)				Yes		No			
Tool Box Talk (please delete one)				Yes		No		Specialist Training (please delete one)				Yes		No			
Assessed by:								Position:									
								Date:									

<sup>3</sup> Please note that the CHIP Symbols are being phased out and will be replaced with the new CLP Symbols.

## Appendix C – COSHH Assessment Request Form

This form must be used to ensure that all hazardous substances have been adequately assessed prior to be used by any employee of the company. The employee must be made aware of the risks and controls prior to using the product, and as such sign for example the COSHH attendance register or toolbox talk etc.

<b>Name of Product</b>			
<b>Manufacturer's Address</b>			
<b>Tel No</b>		<b>Fax No</b>	
<b>How much of the material is used in one working day?</b>			<b>(approx)</b>
<b>How long is the worker exposed to the material during the working day? ✓</b>			
<b>less than ½hr</b>	<input type="checkbox"/>	<b>½hr -2hrs</b>	<input type="checkbox"/>
<b>2-4 hrs</b>	<input type="checkbox"/>	<b>4-8 hrs</b>	<input type="checkbox"/>
<b>Over 8 hrs</b>	<input type="checkbox"/>		
<b>Where is the product to be used?</b>			
Please tick below for potential work areas: ✓			
<b>Inside (well ventilated)</b>	<input type="checkbox"/>	<b>Inside (poorly ventilated)</b>	<input type="checkbox"/>
<b>Outside</b>	<input type="checkbox"/>	<b>Confined space</b>	<input type="checkbox"/>
<b>If other, please state where:</b>			
<b>What is the product used for?</b>			
<b>What trade will use the product?</b>			
<b>What form does the product take</b> <i>e.g. liquid, solid, gas etc?</i>			
<b>How will the product to be applied?</b> <i>e.g. brush, roller, spray, hand application etc.</i>			
<b>Please identify the existing control measure?</b> <i>e.g. local exhaust ventilation, natural ventilation etc.</i>			
<b>Have you attached the SDS (Safety Data Sheet)?</b>	<input type="checkbox"/>	<b>Yes</b>	<input type="checkbox"/>
<b>If not, why not?</b>			
<b>Requested by (Print Name)</b>		<b>Signed:</b>	
<b>Branch/Site/Division</b>		<b>Date:</b>	





*Whilst every effort has been made to provide reliable and accurate information, we would welcome any corrections to information provided by the Writer which may not be entirely accurate, therefore and for this reason, the NASC or indeed the Writer, cannot accept responsibility for any misinformation posted.*

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