

## Equality Impact Assessment of the review of H&S Policy on Control of Substances Hazardous to Health (COSHH)

By: Suzanne Barnes (SB)

Date: 22<sup>nd</sup> May 2025

Project Aim
<i>What does the project aim to achieve? (Please note the financial and / or non-financial outcomes and benefits)</i>
To review and update management arrangements to ensure the health and safety of staff and students working with hazardous substances and / or exposed to hazardous bi-products during the course of their work and study.

<b>Project Title</b>	Review of existing H&S Policy on Control of Substances Hazardous to Health
<b>Project Lead</b>	Suzanne Barnes (SB)
<b>Project Team</b>	

What impact does the project, policy or practice have on people that share a protected characteristic?
<i>Under the equality duty (set out in the Equality Act 2010), the University must have ‘due regard’ to the need to eliminate unlawful discrimination, harassment and victimisation as well as to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. The protected characteristics covered by the equality duty are: <b>age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation</b>. The duty also covers marriage and civil partnerships, but only in respect of eliminating unlawful discrimination. The law requires that the University demonstrates it has had ‘due regard’ to the aims of the equality duty in its planning and decision-making processes. Although not classed as protected characteristics under the Equality Act 2010, due regard must also be made to the effects of planning and decision-making processes on <b>carers</b>. Due regard also needs to be given to the <b>Welsh Language</b> under the Welsh Language (Wales) Measure 2011.</i>

Public Sector Equality Duty Requirements	Detail of Impact (Positive / Neutral / Negative)	Evidence
<b>Eliminating Discrimination</b> <ul style="list-style-type: none"><li><i>Is the project, policy or practice likely to treat anyone less favourably or disadvantage them because of their protected characteristics?</i></li><li><i>Could the project, policy or practice lead to different outcomes for different protected groups?</i></li></ul>	<p>Although the Policy in itself does not treat any person differently, there are specific requirements in the Control of Substances Hazardous to Health Regulations which must be adhered to.</p> <p>This includes the general protection of the health and safety of persons working with hazardous substances and, in addition specific consideration to persons with protected characteristics or who</p>	<p>Risk Assessments should always suitably consider the requirements of the individual when producing controls to safeguard their own health and safety. This can be positive, in ensuring controls are adapted to suit those who could be a greater risk when working with a hazardous substance or who could be exposed to a hazardous substance during the course of the work or study.</p>

	have underlying health conditions who are at greater risk if working with and / or exposed to certain substances.	<p>The risk assessment process should prompt to identify individuals with specific, additional needs which need to be considered.</p> <p>The risk assessment may also identify and restrict activities, for example altering working practices or be offered suitable alternative work as necessary in order to ensure compliance with the Control of Substances Hazardous to Health Regulations.</p>
<b>Advancing Equality of Opportunity</b> <ul style="list-style-type: none"> <li>• <i>Will the needs of staff and students with different protected characteristics be met?</i></li> <li>• <i>Could the project, policy or practice lead to increased take-up / participation by protected groups?</i></li> <li>• <i>Are there any opportunities to proactively advance equality for specific protected groups and / or between protected groups?</i></li> </ul>	There are no obvious ways in which the Policy could further advance equality.	
<b>Promoting Good Relations</b> <ul style="list-style-type: none"> <li>• <i>Have steps been taken to tackle prejudice and promote understanding?</i></li> <li>• <i>How have relevant individuals, groups or organisations been involved / consulted in developing and impact assessing the project?</i></li> </ul>	The policy aims to support and safeguard individuals, whatever their needs. It also aims to encourage dialogue and consideration of all of the factors.	
<b>Based on the above assessment, what course of action is required?</b>		
<b>No major change required</b> <i>The assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.</i>		<b>No changes required in the Policy</b>

<b>Make adjustments to remove barriers or to better advance equality</b> <i>Note the adjustments that will be made to remove barriers identified by the assessment or to better advance equality.</i>	
<b>Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality</b> <i>Note the steps that will be taken to reduce or mitigate the adverse impacts.</i>	
<b>Stop and rethink</b> <i>The assessment shows actual or potential unlawful discrimination. Note the action to be taken to stop and / or rethink the project.</i>	

<b>How will the actual impact of the project, policy or practice be monitored once it has been implemented?</b>
<p>The Policy will be reviewed by the Health, Safety &amp; Emergency Management Committee, as per the schedule of policy review and / or as legislative requirements change.</p>

<b>Publication</b> This Equality Impact Assessment will be published – on the H&S website
--