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# **HAZARDOUS SUBSTANCES SAFETY & COMPLIANCE POLICY**

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Version 1.1



## Version History

Version	Summary of amendments/changes	Published Date
Version 1.0	Document Created	October 2024
Version 1.1	Added: Purpose & Scope, Definitions, Legal & Regulatory Framework, Hazardous Substances Inventory Management, Safety Data Sheets (SDS) & Labelling Requirements, Safe Storage, Transport & Disposal of Hazardous Substances, Emergency Procedures, Record Keeping & Documentation, Audit, Monitoring & Review of Controls, Local Compliance Addendums, Policy Review & Update Schedule, Name updated to Hazardous Substances Safety & Compliance Policy.	November 2025

## Contact Information

IGA Office	info@igauk.com / 0345 319 7000
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## Introduction

Independent Gymnastics Association (IGA) is committed to ensuring the health, safety and wellbeing of everyone involved in our activities, including staff, volunteers, coaches, gymnasts and visitors. Many everyday substances used within gymnastics environments — including cleaning materials, maintenance chemicals, aerosols, adhesives and dusts — can be hazardous to health if not managed appropriately.

This Hazardous Substances Safety & Compliance Policy sets out the standards and responsibilities required to safely manage hazardous substances across all IGA-affiliated activities and premises. It provides guidance for identifying and assessing hazardous substances, ensuring effective control measures, and establishing safe working practices which prevent or minimise exposure.

This policy is designed to ensure compliance with all applicable legislation in the jurisdictions in which IGA operates, including:

- **United Kingdom:** Control of Substances Hazardous to Health (COSHH) Regulations 2002
- **Scotland:** Covered under UK legislation framework
- **Republic of Ireland:** Safety, Health and Welfare at Work (Chemical Agents) Regulations
- **Channel Islands:** Relevant local health and safety laws applicable to hazardous substances



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Nothing in this document replaces or reduces any legal duties placed upon clubs, coaches or employers under local regulatory frameworks. Instead, it supports clear, consistent and practical compliance across the organisation.

By implementing the requirements set out in this policy, IGA and its affiliated clubs demonstrate a proactive and responsible approach to health and safety management, ensuring that environments are safe and that the risks from hazardous substances are properly controlled.

## Purpose & Scope

The purpose of this Hazardous Substances Safety & Compliance Policy is to ensure that all Independent Gymnastics Association (IGA) activities are carried out in an environment where health and safety risks from hazardous substances are properly identified, controlled and monitored. This policy sets out consistent requirements, standards and responsibilities that must be followed to protect staff, volunteers, coaches, gymnasts, visitors and contractors from exposure to substances that could harm their health.

This policy applies to:

- IGA-affiliated clubs and facilities
- All individuals working on behalf of IGA, including employees, coaches, contractors and volunteers
- Any location where hazardous substances are used, stored, handled or disposed of as part of gymnastics operations





- Any substances that may pose a health risk, including but not limited to:
  - cleaning products
  - disinfectants and sanitisers
  - aerosols and sprays
  - adhesives and solvents
  - maintenance and facility chemicals
  - dusts, fumes or other airborne contaminants

This policy is designed to support full compliance with all legally applicable hazardous-substances regulations across the jurisdictions in which IGA operates. It provides clear expectations for:

- Risk assessment of hazardous substances
- Implementation and monitoring of control measures
- Provision of appropriate training and information
- Safe storage, use and disposal of substances
- Emergency and incident response procedures
- Ongoing review of safety practices

Where gymnastics clubs or employers have stricter or more detailed legal duties under local legislation, those requirements take precedence. Clubs remain responsible for ensuring that site-specific operational procedures, assessments and controls meet — or exceed — both legal and IGA policy standards.

By applying this policy consistently, IGA ensures that hazardous substance exposure risks are minimised and that everyone involved in gymnastics activities can enjoy a safe, healthy and supportive environment.

## Definitions

For the purposes of this Hazardous Substances Safety & Compliance Policy, the following definitions apply:

### **Hazardous Substance**

Any chemical, material, or biological agent that has the potential to cause harm to health. This includes substances that are:

- toxic, harmful, irritant or corrosive
- flammable or explosive
- sensitisers (e.g. causing asthma or skin reactions)
- carcinogenic or mutagenic
- capable of producing hazardous fumes, vapours, dusts or mists
- harmful due to prolonged or repeated exposure

### **Exposure**

Any situation where a person contacts or breathes in a hazardous substance through inhalation, skin or eye contact, ingestion or accidental injection.



### **Safety Data Sheets (SDS)**

Documents provided by manufacturers/suppliers containing essential information on handling, storage, health hazards, PPE requirements, first aid and emergency response for each hazardous substance.

### **Risk Assessment**

A systematic process to identify hazardous substances, evaluate potential exposure risks, and determine appropriate measures to eliminate or control those risks.

### **Control Measures**

Any method used to prevent or reduce exposure to hazardous substances including, but not limited to:

- substitution with safer alternatives
- engineering controls (e.g. ventilation, closed systems)
- safe working procedures
- PPE
- restricted access and safe storage

### **PPE (Personal Protective Equipment)**

Equipment or clothing designed to protect individuals from exposure such as gloves, masks, goggles or aprons.

### **Health Surveillance**

Ongoing medical checks carried out where there is a risk of adverse health effects from exposure to hazardous substances (e.g. skin or respiratory monitoring).

### **Employer**

The organisation or club legally responsible for health and safety duties within a specific premises (e.g. the operator of a gymnastics facility).

### **IGA**

Independent Gymnastics Association — the national governing organisation that sets policy, standards and compliance expectations for affiliated clubs.

### **Staff / Coaches / Volunteers**

Individuals working under the direction of IGA or a club, who may be exposed to hazardous substances during their duties.

### **Visitors / Gymnasts / Participants**

Anyone accessing IGA-affiliated premises or participating in activities who may be affected by hazardous substances used or stored on site.

### **Emergency Incident**

Any unexpected event involving a hazardous substance that could cause harm — including spills, leaks, fires, accidental exposure or equipment failure.



## Legal & Regulatory Framework

IGA operates across multiple jurisdictions. As such, hazardous-substances safety and compliance are governed by different but broadly analogous regulatory frameworks depending on location. This section outlines the relevant legislation for each jurisdiction, and the core legal duties that apply.

### 1. United Kingdom (England, Wales, Scotland, Northern Ireland)

- The principal legislation is the Control of Substances Hazardous to Health Regulations 2002 (COSHH), as amended.
- COSHH implements employer duties under the Health and Safety at Work etc. Act 1974 (HSWA 1974), which require protection of health and safety of employees and others affected by work activities.
- Under COSHH, where hazardous substances are used, stored, handled or disposed of, employers must:
  - a. Carry out a risk assessment before use, storage, handling or disposal of any hazardous substance.
  - b. Prevent exposure where reasonably practicable; if that is not possible, control exposure to reduce risk.
  - c. Provide information, instruction and training to employees (and others who may be exposed) about hazards and precautions (e.g. safe handling, PPE, emergency procedures).
  - d. Maintain control measures, and where required, carry out health surveillance or monitoring if there is a risk to health (e.g. repeated exposure to dusts, chemicals, biological agents).
  - e. Ensure that storage, labelling and disposal comply with relevant supply and waste-management regulations, and that Safety Data Sheets (SDS) are used to support safe management of hazardous substances.
- Non-compliance with COSHH and HSWA may lead to enforcement action, fines or prosecution.

Because IGA may operate or have facilities in different parts of the UK (England, Wales, Scotland, Northern Ireland), COSHH applies UK-wide — including Scotland and Northern Ireland (via COSHH NI 2003).

### 2. Republic of Ireland

- In Ireland, the UK COSHH Regulations do not apply. Instead, hazardous chemical agents at work are regulated under the Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001, as amended (most recently via 2015, 2021 and 2024 updates).
- Under these Regulations, any workplace where chemical agents are used, stored, generated or disposed (or where they arise as by-products, waste, fumes, dust, vapour, biological agents) is covered — whether or not the business is primarily a “chemical business.”
- Legal duties under the Chemical Agents Regulations include:



1. Identifying and listing all chemical agents used at the workplace (a chemical-inventory).
2. Performing a risk assessment for each agent and each activity involving agents (storage, handling, use, waste, disposal, by-products).
3. Where hazards are identified, implementing prevention or control measures, wherever possible. This may include substitution, engineering/ventilation controls, procedural controls, PPE, safe storage, segregation, etc.
4. Providing information, instruction and training to workers about risks, safe handling, exposure control, emergency procedures, etc.
5. Arranging for health surveillance where exposure to hazardous agents may pose health risks (e.g. carcinogens, sensitising substances, etc.).
6. Maintaining records of agent inventories, risk assessments, monitoring and health surveillance, and review of control measures.
7. Recent updates reflect newer EU-derived standards (e.g. for carcinogens, mutagens, reprotoxic substances), as codified in the 2024 Code of Practice for chemical agents.

Thus, if IGA operates or works with facilities or members in Ireland, the Irish Chemical Agents Regulations apply — and you must ensure compliance with their provisions rather than relying on UK COSHH.

### **3. Channel Islands (e.g. Jersey, Guernsey)**

- While the UK's COSHH Regulations do not automatically apply in the Channel Islands, equivalent local legislation governs hazardous-substances and workplace health & safety. For example, in Guernsey, hazardous substances must be managed under the local Health & Safety law and official guidance.
- For any facility operated under Channel Islands jurisdiction, controls must meet local legal standards for hazard identification, exposure control, safe storage, labelling, and disposal — broadly aligned with COSHH-style duties.
- IGA must take into account these local laws and, where relevant, prepare local compliance addenda to ensure that substances, procedures, risk assessments and record-keeping meet or exceed the standards required locally.

### **4. Overarching Obligations & Principles**

Across all jurisdictions, certain principles remain common and bind IGA and its affiliated clubs, staff and volunteers. These include:

- The duty to identify hazardous substances (including cleaning agents, cleaning/disinfection chemicals, maintenance chemicals, dusts, aerosols, biological agents, etc.) before use, handling or disposal
- The requirement to carry out a risk assessment for hazardous substances and their use/handling/ storage/ disposal
- The obligation to eliminate or, where that's not reasonably practicable, control exposure to hazardous substances — e.g. through safe working practices, engineering controls, PPE, ventilation, safe storage and disposal
- The duty to provide adequate training, instruction, information and supervision for anyone who may come into contact with hazardous substances (staff, volunteers, contractors, visitors, gymnasts)





- The need for appropriate documentation: Safety Data Sheets (SDS), labelled containers and storage, risk-assessment records, control measures records, monitoring/health surveillance (where required), incident logs, emergency-response plans, periodic review of risk assessments
- The requirement to manage hazardous-substance disposal/waste in a safe, compliant manner (as per relevant environmental and waste-handling regulations)
- The duty to respond appropriately to accidents, spills or incidents involving hazardous substances with defined emergency procedures

### **Implications for IGA Policy**

Because IGA may operate (or have facilities, members or activities) across the UK, Ireland and the Channel Islands, your Hazardous Substances Policy must:

- Reference all relevant legislation for each jurisdiction
- Require a hazardous-substance inventory, risk assessments, SDS management, control measures, PPE, training, record-keeping, disposal and emergency procedures
- Allow for local "addendum" compliance where local law differs (e.g. in Channel Islands or Ireland)
- Be reviewed periodically and whenever new substances or activities are introduced

Failure to comply with relevant law in any jurisdiction may expose IGA (or local club/employer) to legal risk, liability or enforcement action.

## **Roles & Responsibilities**

Effective management of hazardous substances relies on clear accountability at every level within IGA and its affiliated clubs. All individuals involved in gymnastics operations must understand their role in preventing or controlling exposure to substances hazardous to health.

### **1. Independent Gymnastics Association (IGA)**

IGA is responsible for:

- Providing guidance, communication and support to affiliated clubs in the implementation of this policy
- Providing templates, tools and training materials to support risk assessment and safe working practices
- Setting expectations for clubs, coaches and staff regarding hazardous-substance safety and ensuring that non-compliance is addressed appropriately

IGA may require clubs to demonstrate compliance as a condition of membership.

### **2. Clubs / Facility Operators (Employers)**

Club operators hold the primary legal duty for ensuring hazardous-substance safety at their facilities. Their responsibilities include:

- Maintaining a register of all hazardous substances used or stored on site (including cleaning and maintenance products)
- Ensuring Safety Data Sheets (SDS) are accessible and up to date
- Conducting risk assessments for all hazardous-substance use and reviewing them regularly
- Implementing effective exposure prevention and control measures
- Providing appropriate PPE and ensuring correct use, maintenance and replacement



- Ensuring secure storage, labelling and disposal of hazardous substances
- Providing training, information and supervision to staff and volunteers
- Establishing emergency response procedures including spills, first aid and reporting
- Carrying out health surveillance where required
- Keeping accurate records of all assessments, training and incidents
- Ensuring contractors and third-party service providers follow safe procedures while onsite
- Clubs must ensure that these responsibilities are delegated to named, competent persons within their organisation.

### **3. Coaches, Staff and Volunteers**

All personnel involved in gymnastics operations must:

- Follow all safety procedures and control measures relating to hazardous substances
- Use PPE correctly where required
- Read and follow instructions on labels and SDS before handling chemicals
- Avoid creating additional risk (e.g. incorrect mixing of products, unsafe storage or disposal)
- Report any accidents, spills, equipment malfunctions or near misses immediately
- Participate in required training and refreshers
- Raise concerns where hazardous-substance risks are inadequately controlled

Failure to follow safe systems of work may result in disciplinary action or removal from duties.

### **4. Contractors and External Service Providers**

Contractors (e.g., cleaners, maintenance teams) must:

- Comply with this policy and site-specific instructions
- Provide SDS and risk assessments for any substances they bring onsite
- Work only in designated areas and times where risks can be controlled
- Report any hazardous-substance incidents immediately to the club operator

Clubs must ensure contractors are competent and supervised appropriately.

### **5. Gymnasts, Parents, Guardians and Visitors**

All facility users must:

- Follow any safety instructions given regarding their proximity to hazardous substances
- Avoid interfering with stored substances, chemicals or equipment
- Report concerns or observed hazards to a responsible member of staff

This supports a safe environment for everyone.

### **6. Accountability and Enforcement**

Failure to comply with this policy may result in:

- Withdrawal of approval for certain activities
- Temporary suspension of coaching or club affiliation
- Escalation to IGA governance and/or relevant enforcement authorities

Clubs are responsible for ensuring non-compliance by individuals is dealt with promptly and appropriately.



## Hazardous Substances Inventory Management

### 1. Purpose of the Inventory

The Hazardous Substances Inventory (also known as a “chemical inventory” or “COSHH register”) provides a complete, up-to-date record of all hazardous substances used, stored, handled, generated, or disposed of within any IGA-affiliated facility or activity.

The inventory enables IGA, clubs, staff and enforcement/inspection bodies to:

- identify which hazardous substances are present on site, and where they are located
- ensure appropriate Safety Data Sheets (SDS) / hazard information is available for each substance
- link each substance to the relevant risk assessment(s), control measures, storage arrangements and disposal records
- track review dates, re-assessments and updates when processes or substances change
- monitor compliance and support audits, inspections, and safe-substance management

### 2. What the Inventory Should Contain

For each hazardous substance present or used in IGA operations, the inventory should record at minimum:

Field / Entry	Details / Notes
Substance name (as on label)	Full product name / chemical name / trade name
Supplier / Manufacturer details	Name, address, contact number – as per SDS
Quantity held / stored	Volume / mass currently in site stock
Location of storage / use	Exact storage location / area (cupboard, store room, gym, maintenance area, etc.)
Intended use(s) / activity(ies)	Cleaning, maintenance, disinfection, repair, maintenance, consumables, etc.
Date of first entry to inventory	For historical tracking
Safety Data Sheet (SDS) reference	SDS file name / link / storage location; date obtained
Date of most recent risk assessment for that substance / activity	Helps ensure assessments stay current
Control measures in place	PPE, ventilation, storage protocols, handling instructions, any special controls
Review / re-assessment date	When next review or re-assessment is due
Disposal / waste record (if used/disposed)	Include date, quantity disposed, waste-carrier details or disposal method, and waste-transfer or consignment note where applicable



### 3. Maintaining and Updating the Inventory

IGA and affiliated clubs must ensure the inventory stays accurate and up to date, as follows:

- **Initial full audit:** Conduct a site-wide survey of all premises (storage, cleaning closets, maintenance areas, common rooms, cleaning/maintenance supplies) to identify all hazardous substances — including those produced during activities (dust, fumes, adhesives, maintenance chemicals, cleaning materials, disinfectants, paints, glues, solvents etc.).
- **At each new acquisition or delivery:** Upon receipt of any new hazardous substance, immediately add it to the inventory and obtain and file its Safety Data Sheet (SDS).
- **Immediately after a change:** If a substance's use changes, is repurposed, or is moved to a new location, update the inventory and link to relevant risk assessment(s).
- **Periodic review:** Undertake a full review of the inventory at least once per year (or more often if operations or substances change).
- **Disposal and depletion tracking:** When substances are used up, disposed of, or removed from site, record the disposal details (quantity, method, date, disposal documentation) and remove or update the inventory entry accordingly.

### 4. Safety Data Sheets (SDS) & Documentation Storage

- For every hazardous substance listed, the corresponding up-to-date SDS must be obtained from the supplier/manufacturer and stored centrally (digital or physical). This SDS must be readily accessible to any person undertaking risk assessments or handling the substance.
- SDSs must be reviewed whenever a new version is issued by the supplier — and the record in the inventory updated accordingly.
- All risk assessments, control measure records, disposal records, usage logs and training records related to hazardous substances must be linked to the corresponding inventory entry.

### 5. Use of the Inventory in Risk Management and Regulatory Compliance

- **The inventory forms the basis for all risk assessments:** you cannot assess a hazardous substance if you do not know it exists on site. Under Control of Substances Hazardous to Health Regulations 2002 (COSHH — UK) and equivalent legislation elsewhere, risk assessment and control of hazardous substances is mandatory before use.
- **In jurisdictions outside the UK** (e.g. Republic of Ireland), compliance under regional hazardous-substances laws (e.g. the Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001) similarly requires identification, assessment and control of all chemical agents used or generated.
- **The inventory supports safe storage, handling and disposal procedures** — especially important where hazardous waste, residuals or by-products are involved.

### 6. Responsibility for Inventory Management

Club / facility operators (employers) bear primary responsibility for maintaining the inventory, ensuring it is accurate and complete.

IGA (national/original body) is responsible for:

- providing a template or standardised inventory/register format for clubs,
- ensuring clubs maintain their inventory, through periodic audits or compliance checks,
- providing guidance, training and support for hazardous-substance management.





## 7. Review & Audit

- The inventory must be reviewed (and re-validated) at least annually.
- A full re-audit is required whenever there is a significant change: e.g. new cleaning/maintenance processes, new substances introduced, or a change of storage/use location.
- Inventories must be retained for the lifetime of the facility, or for a minimum statutory period where local regulations require (e.g. records relating to disposal, waste transfer, exposure monitoring).

## Risk Assessment Process

Risk assessments are a legal requirement wherever hazardous substances are used, stored, handled, or disposed of within IGA-affiliated environments. They must be completed before any activity involving a hazardous substance occurs and must be reviewed regularly.

The purpose of the risk assessment is to identify potential health risks and ensure suitable and effective control measures are in place to eliminate or minimise exposure.

### 1. What Must Be Assessed

A hazardous-substance risk assessment must consider:

- The substance itself (hazards, risks, classification)
- The activity (how the substance is used, applied, created or disposed)
- Routes of exposure, including:
  - inhalation (vapours, sprays, dusts)
  - skin or eye contact
  - ingestion
  - injection or puncture injuries
- Who may be exposed, including:
  - cleaning and maintenance staff
  - coaches, volunteers, contractors
  - gymnasts, parents and visitors
- Duration and frequency of exposure
- Quantity and concentration of the substance
- Workplace environment, including ventilation and access
- Emergency and accidental exposure potential (spills, misuse, leaks)
- Interactions with other substances or conditions

### 2. Steps in the Risk Assessment

All risk assessments must follow this structured process:

1. Identify the hazardous substance
  - Refer to the Hazardous Substances Inventory and SDS
2. Review the Safety Data Sheet (SDS)
  - Understand hazard classifications, handling and emergency requirements
3. Determine who may be exposed and how
  - Consider direct users and indirect contact (e.g., aerosols in public spaces)



### 3. Hierarchy of Control

Control measures must follow the legally recognised hierarchy:

1. **Elimination** – Stop using the hazardous substance where possible
2. **Substitution** – Replace with a safer alternative
3. **Engineering controls** – Ventilation, containment, barriers
4. **Administrative controls** – Procedures, supervision, training, signage
5. **Personal Protective Equipment (PPE)** – Last line of defence

### 4. Reviewing Risk Assessments

Risk assessments must be reviewed:

- Annually, as a minimum
- Immediately if:
  - a new hazardous substance is introduced
  - the activity or location changes
  - an incident or near miss occurs
  - controls are not working effectively
  - new information becomes available (e.g., updated SDS)

Expired or outdated risk assessments must not be used.

### 5. Documentation and Storage

All risk assessment records must be:

- Stored alongside the Hazardous Substances Inventory
- Accessible to anyone who may be exposed
- Retained for regulatory-compliance purposes in line with local legislation

Electronic copies should be backed up and version-controlled.

### 6. Competency Requirements

Risk assessments must be carried out by a competent person, i.e., someone who has:

- Knowledge of the substance and processes involved
- Understanding of the legal duties and safety requirements
- Authority to implement corrective actions

## Control Measures to Reduce Exposure

Where hazardous substances are used, stored, handled or disposed of in any IGA-affiliated activity or facility, appropriate control measures must always be in place. These measures are selected according to the risk assessed and in line with the accepted hierarchy of controls.



## 1. Hierarchy of Controls – Order of Priority

Control measures must be considered in the following order of effectiveness.

1. **Elimination** – remove the hazard or cease the use of the hazardous substance entirely.
2. **Substitution** – replace the hazardous substance or process with one that is safer (lower toxicity, less volatile, etc.).
3. **Engineering Controls** – modify the environment or use equipment to isolate or minimize exposure (e.g. ventilation, containment).
4. **Administrative Controls / Safe Working Procedures** – adopt working practices that reduce exposure (schedules, training, supervision, limiting access).
5. **Personal Protective Equipment (PPE)** – provide PPE only when other controls do not remove the risk entirely, or to supplement other controls.

PPE must not be the first line of defence – it should be used only when elimination, substitution, or engineering/administrative controls alone cannot adequately control risk.

## 2. Examples of Acceptable Control Measures

Depending on the substance and the task, the following controls (alone or in combination) might be appropriate:

### 2.1 Elimination / Substitution

- Avoid using hazardous chemicals where possible (e.g. choose less toxic cleaning agents)
- Replace powder/dust-forming chemicals with liquid or less hazardous alternatives
- Use cleaning methods that generate fewer fumes / dusts

### 2.2 Engineering Controls

- Use local exhaust ventilation (LEV) or general ventilation for tasks that produce dust, fumes, vapour or spray.
- Use enclosed or semi-enclosed systems for mixing or handling chemicals where practicable (e.g. mixing in closed containers rather than open buckets)
- Provide suitable storage cupboards or ventilated storage for hazardous substances to minimise risk from vapours or leaks

### 2.3 Administrative Controls & Safe Working Procedures

- Develop and enforce safe work procedures, including handling, dilution, disposal, and cleaning protocols
- Restrict access to hazardous-substance stores to authorised, trained personnel only
- Provide supervision when hazardous substances are handled, particularly by volunteers or less experienced staff
- Limit the number of people exposed, the frequency, duration, and quantity of hazardous-substance use



- Maintain cleaning schedules to prevent build-up of residues/dusts
- Display clear labelling and hazard signage where hazardous substances are used or stored
- Maintain up-to-date records of substance use, storage locations, and control measures (linked to the Inventory and Risk Assessment records)

## **2.4 Personal Protective Equipment (PPE)**

Where risk cannot be removed or adequately controlled by other means:

- Provide appropriate PPE (gloves, goggles, respirators, aprons, etc.) suitable for the substance and exposure route.
- Ensure PPE is correctly fitted, maintained, stored, and replaced as needed
- Provide training to staff on correct use, removal, disposal of PPE
- Combine PPE use with other controls (ventilation, restricted access, safe handling) rather than relying on PPE alone

## **3. Monitoring, Maintenance & Review of Control Measures**

- All engineering controls (e.g. ventilation systems) must be regularly inspected, tested and maintained to ensure continued effectiveness.
- Records of maintenance, inspections, and any repairs must be kept, ideally along with the hazardous-substances inventory and risk assessments.
- After any incident (e.g. spill, leak, exposure, near-miss), control measures must be reviewed and modified if necessary
- Control measures must be re-assessed whenever there is a change — a different substance, a change in process, more frequent use, a change of location, or new information about hazards

## **4. Implementation & Compliance Responsibility**

- It is the responsibility of the club / facility operator (employer) to ensure appropriate control measures are in place, maintained and followed.
- All staff, volunteers and contractors must comply fully with safe working procedures, use provided PPE, follow instructions, and report any leaks, spills, or safety concerns immediately.
- Failure to follow the safety procedures may result in removal from hazardous-substance tasks, or other disciplinary measures, to protect health and safety.

## **5. Reference to Legal Requirements**

- Under the UK Control of Substances Hazardous to Health Regulations 2002 (COSHH), where hazardous substances are used, employers must prevent or adequately control exposure.
- In the Republic of Ireland, under the Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001 (as amended), employers must implement prevention or control measures appropriate to the risks identified by the risk assessment.
- The policy requires control measures to be proportionate, practical, maintained, and regularly reviewed, in line with both UK and Irish regulatory standards.





## Safety Data Sheets (SDS) & Labelling Requirements

Correct and accessible chemical hazard information is essential to ensuring the safe use, storage, handling and disposal of hazardous substances within IGA-affiliated organisations. Safety Data Sheets (SDS) and compliant labelling provide the foundation for risk assessments and safe working practices.

### 1. Safety Data Sheets (SDS)

For every hazardous substance purchased, used, stored or disposed of, an up-to-date SDS must be:

- obtained directly from the supplier or manufacturer
- kept on file before the substance is used
- easily accessible to all staff who may be exposed
- linked to the relevant Hazardous Substances Inventory entry
- referenced during risk assessment and staff training

SDS must contain, at minimum:

- product identification and supplier details
- hazard classification and labelling information
- safe usage instructions and exposure controls
- first aid and spill response measures
- storage and disposal requirements
- PPE requirements
- toxicology and environmental hazard data

Suppliers are legally required to provide SDS at no cost — they must be supplied automatically with hazardous chemicals and updated whenever new hazard information becomes available. Only the latest version must be used. Outdated SDS must be replaced and removed from use.

### 2. Labelling Requirements

All hazardous substances must remain in their original supplier-labelled containers whenever possible.

Labels must be:

- intact, legible and firmly attached
- visible at point of use
- displaying the correct hazard pictograms
- written in English (or language used locally in that jurisdiction)

Hazard labels must follow the requirements under:

- UK CLP Regulation (post-EU retained version)
- EU CLP Regulation (for substances in Ireland)
- Local equivalents for the Channel Islands



Labels must include:

Label Element	Requirement
Product name	Clearly identifiable
Supplier details	Name, address & phone
Hazard pictograms	As per CLP classification
Signal word	e.g. “Danger” or “Warning”
Hazard statements	The nature of hazard(s)
Precautionary statements	How to handle safely

If a substance is transferred into a secondary container (e.g., trigger spray):

- It must be labelled immediately with all required hazard information
- Unmarked containers are prohibited

Decanted cleaning solutions, dilution bottles and sprayers must never be left unlabelled.

### 3. Prohibited Practices

To maintain safety, the following are strictly prohibited:

- storing chemicals in food or drink containers
- handwritten or ambiguous labels
- mixing chemicals without assessment (risk of toxic gas, reaction etc.)
- allowing old or incorrect labels to remain on reused containers
- removing or defacing hazard information

Any container without a clear hazard label must be:

- 🚫 withdrawn from use immediately
- 🔍 inspected
- ♻️ correctly labelled or safely disposed of

### 4. SDS & Label Checks During Audits

As part of regular compliance checks:

- SDS files will be checked for completeness and most recent revision dates
- Inventory entries must match SDS reference numbers
- Serial sampling of labelled containers will be carried out to ensure:
  - correct identification
  - matching control measures
  - compliance with CLP pictograms

Any issues must trigger corrective action and may prompt an updated risk assessment.



## 5. Responsibility for SDS & Labelling Compliance

- Club operators are responsible for ensuring SDS availability and correct product labelling
- Coaches, staff and volunteers must not use substances that lack SDS or proper labels
- IGA may audit SDS and label compliance and require remedial action

## Safe Storage, Transport & Disposal of Hazardous Substances

Ensuring hazardous substances are safely stored, transported and disposed of is essential to protect health, safety and the environment. This section sets out mandatory requirements for IGA-affiliated facilities and staff.

### 1. Safe Storage

#### 1.1 Storage Principles

All hazardous substances must be stored in accordance with the following principles:

- In original, labelled containers wherever possible
- In a dedicated storage area (e.g. locked cupboard or storage room) — not in general-access areas, changing rooms or places accessible by children or unauthorised persons
- With segregation: incompatible substances (e.g. acids and alkalis, oxidisers and flammables) must be stored separately and away from heat, ignition, direct sunlight or sources of moisture
- In a storage area that is secure, well ventilated, dry, cool and stable — ideally with restricted access for authorised personnel only
- With containment measures (e.g. spill trays, secondary containment) to contain leaks or spills, especially for liquids, corrosives or volatile substances

#### 1.2 Labelling and Inventory Link

- Storage areas must be clearly labelled to indicate presence of hazardous substances (e.g. “Chemical Store — authorised personnel only”)
- A copy of the hazardous-substances inventory and associated Safety Data Sheets (SDS) must be kept close to the storage location (or available electronically with clear access)
- Any new substance entering storage must be added to the inventory before storage and use

### 2. Transport (On-Site or Between Sites)

Where hazardous substances must be transported — internally within the facility, or between IGA-affiliated sites — the following controls apply:

- Transport must use suitable sealed, labelled containers (original packaging or appropriately labelled secondary containers)
- Where required, transport containers should use secondary containment (e.g. trays, sealed boxes) to prevent leaks in case of spillage or breakage
- Transport should be done in a manner that minimises risk of spill, leak or drop — using secure trolleys, sealed containers, and avoiding carrying in public areas where possible
- Where hazardous substances are moved between sites (e.g. different clubs, events), ensure transport complies with any local/ national chemical-transport regulations (especially for larger quantities or regulated chemicals)
- Maintain a log of transported hazardous substances: date, origin, destination, quantity, person responsible — linked to the inventory



Ensuring hazardous substances are safely stored, transported and disposed of is essential to protect health, safety and the environment. This section sets out mandatory requirements for IGA-affiliated facilities and staff.

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- Where hazardous substances are moved between sites (e.g. different clubs, events), ensure transport complies with any local/ national chemical-transport regulations (especially for larger quantities or regulated chemicals)
- Maintain a log of transported hazardous substances: date, origin, destination, quantity, person responsible — linked to the inventory

## **3. Disposal of Hazardous Substances and Waste**

### 3.1 General Disposal Principles

- Hazardous waste must be disposed of safely in line with local waste regulations — not simply discarded in general waste or drains





- Used or empty containers should be treated as hazardous waste if residues remain, or rinsed/cleaned in line with SDS guidance (if safe and permitted) before disposal
- Disposal methods must align with SDS instructions and local environmental law (UK, Ireland, Channel Islands as applicable)

### 3.2 Waste Segregation and Containment

- Separate hazardous waste from general waste — use dedicated, clearly labelled containers for hazardous waste (chemicals, cleaning residues, contaminated rags, used PPE, etc.)
- Containers must be sealed, leak-proof, properly labelled and stored securely until collected for disposal
- Waste transfers must be documented — including quantity, date, method of disposal or transfer to a licensed waste-carrier (where required)

### 3.3 Use of Licensed Waste Carriers / Disposal Services

- For regulated hazardous waste (e.g. solvents, corrosive chemicals, large volumes), IGA or club operators must engage licensed waste-carrier or approved disposal facilities in line with relevant national/ local regulations
- Maintain records (waste-transfer notes, receipts, disposal certificates) for audit and compliance

### 3.4 Prohibition of Improper Disposal

The following are strictly prohibited:

- Pouring hazardous substances or residues down sinks, toilets or drains (unless SDS explicitly allows safe disposal)
- Disposing of hazardous waste with general domestic/commercial waste
- Leaving partially used containers unsealed or unlabeled
- Burning hazardous substances or containers (unless disposal instructions explicitly permit and are compliant with local law)

## **4. Responsibilities for Storage, Transport & Disposal**

- Club / Facility Operators (Employers):
  - Ensure all storage, transport, and disposal procedures comply with this policy
  - Provide appropriate storage areas, containment equipment and waste-disposal arrangements
  - Maintain inventory and waste-transfer documentation
- Staff, Coaches, Volunteers:
  - Use only approved containers and transport methods
  - Follow all storage and disposal instructions from SDS and policy
  - Report leaks, spills or unsafe storage immediately
- Contractors and External Service Providers:
  - Must follow this policy when handling or disposing hazardous substances on IGA premises
  - Provide SDS and waste-disposal documentation when delivering or removing hazardous materials



- 5. Audit, Review & Record-Keeping Requirements
- Storage, transport and disposal practices must be audited at least annually — or more frequently if there are incidents, changes in substances, or change of site
- All waste-transfer, disposal and transport records must be retained for the minimum statutory period required in the relevant jurisdiction (UK, Ireland, Channel Islands)
- Any changes in process, substances used or volume must trigger a review of risk assessments, storage plans and disposal arrangements

## 6. Compliance with Legislative Requirements

This section helps ensure compliance with:

- UK: COSHH Regulations 2002, environmental / waste-disposal law, CLP labelling & supply regulations
- Republic of Ireland: Chemical Agents Regulations, environmental / waste-disposal regulations, CLP labelling law under EU standards
- Channel Islands: Relevant local health & safety and environmental-waste regulatory frameworks

By strictly following the procedures defined here, IGA and affiliated clubs meet or exceed legal obligations for hazardous-substances management and minimise risks to health, safety and environment.

## Health Surveillance & Monitoring

This section sets out when and how IGA (and affiliated clubs/facilities) must monitor the health of staff, volunteers or others exposed to hazardous substances — to detect early signs of work-related ill-health, verify effectiveness of controls, and protect individuals' health.

### 1. Purpose of Health Surveillance

Health surveillance is a systematic process of checking the health of individuals exposed to hazardous substances to detect early signs of adverse effects. Its objectives include:

- Protecting the health of workers by early detection of work-related conditions (e.g. dermatitis, asthma, lung problems).
- Evaluating whether existing control measures remain effective.
- Helping prevent long-term health issues through timely intervention or changes to controls.

Health surveillance is not the same as a general health check or health promotion — it's a targeted, risk-based intervention tied to workplace hazards.

### 2. When Health Surveillance is Required

IGA or the club/facility operator must arrange health surveillance where a risk assessment shows that:

- Exposure to a hazardous substance may cause a disease or other adverse health effect associated with that substance (e.g. sensitising chemicals, dusts, fumes, corrosives).
- There is a reasonable likelihood that such a health effect may occur under workplace conditions.



- It is possible to detect early signs of the health effect through suitable surveillance methods (e.g. skin checks, lung function tests, biological monitoring).

Examples include (but are not limited to) exposure to:

- irritant or sensitising cleaning chemicals, solvents, disinfectants
- dusts, mists or aerosols (e.g. from maintenance, cleaning, repair activities)
- substances known to cause dermatitis, asthma, respiratory problems, or other occupational illnesses

In jurisdictions where hazardous-chemical use is regulated (e.g. under UK Control of Substances Hazardous to Health Regulations 2002 – COSHH, or in Ireland under Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001), health surveillance must be provided when such conditions are met.

### 3. Scope & Types of Surveillance / Monitoring

Depending on the hazards identified and risk assessment outcomes, health surveillance may include:

- **Skin monitoring** — for staff handling irritant or corrosive substances, or sensitising chemicals that may cause dermatitis or skin damage.
- **Respiratory monitoring** — for exposure to dust, fumes, vapours or aerosols (e.g. cleaning sprays, solvents, dust) that may cause asthma, lung irritation or other respiratory effects
- **Biological monitoring or effect-monitoring**, where appropriate (blood or urine tests, biomarker checks) — where substances have dose-related or cumulative effects, or where biological limit values apply under local law.
- **Medical surveillance by qualified occupational-health professionals** — when required by law or risk assessment, especially for high-hazard substances or prolonged exposure.

Surveillance should be proportionate to the assessed risk and should not be carried out unnecessarily when risk is low or eliminated.

### 4. Implementation & Responsibility

- The club / facility operator (employer) is responsible for determining whether health surveillance is required, arranging it, and ensuring participation of relevant staff.
- Surveillance must be performed by a competent occupational-health professional (doctor or nurse experienced in occupational health) when needed.
- Employees must be informed about the surveillance rationale, what it involves, and have opportunity to consent where required.
- If surveillance detects early signs of ill-health, employer must:
  - a. review the relevant risk assessment,
  - b. re-evaluate control measures,
  - c. consider reassigning affected person to lower-risk work if needed, and
  - d. monitor others similarly exposed.



## 5. Record-Keeping, Confidentiality & Data Protection

- Health-surveillance records (exposure data, medical results, follow-up actions) must be maintained securely and confidentially.
- Records must include summary findings (not personal medical details) for trend analysis and compliance audits.
- Individual employees have the right to access their personal health records when requested.
- Data storage and handling must comply with relevant data-protection laws.

## 6. Review & Monitoring of Surveillance Programme

- The need for continued health surveillance must be reviewed periodically — at least annually, or sooner if working conditions or substances change.
- The effectiveness of control measures should be re-evaluated using surveillance results. If evidence shows controls are inadequate, the risk assessment and control strategy must be updated.
- If no adverse effects are detected over a prolonged period and risk remains low, the surveillance programme may be adjusted or discontinued (with documented decision and review schedule).

## 7. Applicability Across Jurisdictions

- In the UK (England, Scotland, Northern Ireland), COSHH requires health surveillance where risk assessment identifies a likely health effect.
- In the Republic of Ireland, under the Chemical Agents Regulations, employers must provide health surveillance when exposure to hazardous chemical agents is likely and may result in health effects, and when biological limit values apply.
- For facilities operating under Channel Islands jurisdiction, local health-and-safety regulations apply. Where local law requires or permits health surveillance, this policy's provisions should be implemented and adapted accordingly.

## Training & Competency Requirements

To ensure the safe management of hazardous substances and compliance with applicable health & safety laws, IGA and its affiliated clubs must provide appropriate training, ensure competency, and maintain records.

### 1. Who Needs Training

Training must be provided to:

- All employees, coaches, volunteers or contractors who may handle, store, use, transport or dispose of hazardous substances — including cleaning/maintenance staff, coaches using equipment requiring cleaning or disinfection, or any staff exposed to dust, fumes, adhesives, chemicals, etc.
- Supervisors and those responsible for risk assessments, storage, disposal and general supervision of hazardous-substance use.
- Any new staff, or existing staff when new hazardous substances or new tasks are introduced.





- Contractors or external service providers before they begin work on site involving hazardous substances.

## 2. What Training Should Cover

Training must ensure that relevant persons understand:

- The nature and hazards of the substances they may meet (types of substances, routes of exposure, potential health risks)
- How to read and use Safety Data Sheets (SDS) and hazard labels correctly — including understanding hazard pictograms, classification, and safety instructions.
- The results and key points from relevant risk assessments for their tasks — what the hazards are, who is at risk, and how risk is controlled.
- Correct use of control measures, including engineering controls, safe working procedures, and use, maintenance, and disposal of Personal Protective Equipment (PPE) (or other controls as required).
- Proper procedures for storage, transport and disposal of hazardous substances, including segregation, containment, waste-handling and safe disposal.
- Emergency procedures: what to do in case of spills, accidental exposure, leaks or other hazardous-substance incidents; first aid, spill control, and reporting protocols.
- Their personal responsibilities under the policy: safe handling, reporting hazards/incidents, following procedures, using PPE, keeping up-to-date with training.

For staff in jurisdictions outside the UK (e.g. the Republic of Ireland), training must also reflect relevant local legislation obligations under the Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001 (as amended).

## 3. Frequency and Timing of Training

- **Initial training** must be provided before any person is exposed to hazardous substances or begins tasks involving hazardous substances.
- **Refresher training** must be provided at suitable intervals (e.g. annually or when substances/processes change) — and whenever risk assessments are updated or new control measures introduced.
- **Additional training** should be provided when:
  - new hazardous substances are introduced,
  - new tasks or procedures involving hazardous substances begin,
  - there has been an incident, spill or near-miss involving hazardous substances, or
  - there is a change in staff role or responsibilities.

## 4. Competency and Supervision

- Training should be carried out (or overseen) by a competent person — someone with sufficient knowledge of hazardous-substance risks, control measures, legal requirements, and safe working practices.
- For small clubs or organisations without in-house expertise, IGA recommends using external qualified health & safety consultants or recognised training providers to deliver or certify training.
- All new, temporary, or agency staff and contractors must be supervised during their initial use of hazardous substances until competency is demonstrated.



## 5. Records and Documentation

- Maintain a training register listing all individuals trained, the content and date of training, and any refresher dates scheduled.
- Ensure SDS, risk assessments, control-measure records, and training records are linked and accessible — particularly for inspection, audit or health-surveillance purposes.
- Keep records for a minimum period consistent with local law (or longer if required), to document compliance and support health-and-safety audits.

## 6. Contractor & External Worker Requirements

- Contractors and external service providers who bring hazardous substances onto IGA premises must present evidence of adequate training and competence before commencing work.
- They must comply with IGA's hazardous-substance policy, including SDS provision, risk assessments, safe working procedures and waste-disposal requirements.
- Clubs must monitor contractor compliance and may refuse permission or terminate contracts if safety standards are not met.

## 7. Continuous Improvement & Review

- IGA and clubs should periodically review the effectiveness of training and competency arrangements — for example after incidents, near-misses, staff turnover, or when new regulations or substances are introduced.
- Training content should be updated where legislation changes, new risks emerge, or new best-practice guidance is released.
- Feedback from staff, incidents, or audits should inform updates to training and safety procedures.

# Emergency Procedures

All IGA-affiliated clubs must have clear and effective procedures for responding to accidents, spills or unintended exposure involving hazardous substances. Emergency actions must be known to all relevant personnel and practiced as part of safety training.

Emergency procedures must be based on the information within the Safety Data Sheets (SDS), local risk assessments, and this policy.

## 1. General Emergency Principles

In any hazardous-substance incident, the following priorities apply in order:

**Protect people** — move individuals away from risk

**Contain the hazard** — prevent spread or escalation

**Communicate** — raise the alarm, call for assistance

**Resolve safely** — only trained persons to respond

**Report and document** — ensure follow-up and review

If there is any doubt, evacuate the area immediately and call emergency services.



## 2. Spill Response Procedures

Spill response actions must be specific to the substance type (refer to SDS). The following minimum steps apply:

- Raise the alarm immediately and restrict access to the contaminated area
- Avoid breathing vapours/aerosols or touching the spill
- If safe and trained to do so:
  - Wear appropriate PPE
  - Ventilate the area
  - Contain the spill using absorbent materials or spill kits
  - Prevent spill entering drains or public-access areas
- Await specialist assistance for large, dangerous, or unidentified spills
- Collect and dispose of contaminated materials according to disposal procedures

A spill kit must be stocked and accessible near all areas where hazardous substances are stored or used.

## 3. First Aid Procedures

If a person is exposed to a hazardous substance:

- Remove the person from the exposure area immediately
- Remove contaminated clothing if safe to do so
- Flush affected skin/eyes with clean water for at least 10–15 minutes (as per SDS)
- Do not induce vomiting unless advised by a medical professional
- Seek medical assistance for any:
  - Eye exposure
  - Inhalation of fumes or sprays
  - Burn, blistering, breathing difficulties, or persistent irritation
- Provide the SDS to medical responders when available

Where inhalation injury or breathing difficulty is suspected:

## 4. Fire or Explosion Risk

Where flammable or reactive substances are involved:

- Sound emergency alarm and evacuate immediately
- Call emergency services — do not attempt to tackle a fire unless trained and safe to do so
- Prevent re-entry until area is declared safe by competent personnel

Flammable storage must always be located away from ignition sources to prevent these situations arising.

## 5. Incident Reporting & Investigation

All hazardous-substance incidents — even if successfully controlled — must be:

- Reported to the Club responsible person immediately after the situation is safe
- Recorded in the organisation's incident reporting system



- Investigated to determine:
  - what occurred
  - root causes
  - whether control measures or training failed
  - corrective actions needed

Any incident involving hospital treatment, serious exposure, or fire must be escalated to IGA and local enforcing authorities where required by law.

Lessons learned must be shared and reflected in updated risk assessments and procedures.

## 6. Post-Incident Clean-up and Waste Control

- Clean-up must only be undertaken by trained individuals wearing appropriate PPE
- All contaminated materials must be treated as hazardous waste and disposed of under waste-disposal requirements
- Area must be signed off as safe before reoccupation

## 7. Communication & Signage

- Emergency contact information must be clearly displayed near all hazardous-substance areas
- Staff must know:
  - who to alert
  - where emergency equipment is located
  - evacuation routes

Signage must comply with local and statutory health-and-safety requirements.

## 8. Coordination with Emergency Services

Clubs must ensure emergency responders have:

- Access to SDS
- Knowledge of substances stored onsite and their locations
- Updated contact details for responsible persons
- Floor plans if needed for rapid access and evacuation

## Responsibilities Summary

Role	Emergency Duties
Club Operator	Ensures plans exist, equipment available, staff trained
Coaches/Staff	Act promptly, protect others, follow procedures, report incidents
Contractors	Follow site emergency rules and SDS instructions
IGA	Provide guidance, monitor compliance, support incident review





## Record Keeping & Documentation

Accurate, up-to-date record keeping is fundamental to managing hazardous substances safely and ensuring compliance with legal obligations. All IGA-affiliated clubs, facilities and staff must maintain comprehensive documentation as described below.

### 1. What Records Must Be Kept

Each club/facility must maintain the following records (physical or electronic):

- **Hazardous Substances Inventory / Register** — full list of all hazardous substances used, stored, transported or disposed of on site, with all required fields (substance name, supplier, storage location, SDS reference, control measures, etc.).
- **Safety Data Sheets (SDS)** — one SDS for each hazardous substance, the latest version provided by the supplier, accessible for anyone handling or assessing chemicals.
- **Risk Assessment Records** — for each hazardous substance and each hazardous activity; documenting identified risks, exposure routes, persons at risk, control measures, assigned responsibility, and review dates.
- **Control Measures Records** — documentation of what controls are in place (engineering, PPE, procedures), maintenance logs for equipment (e.g. ventilation), inspection and testing logs, and any updates.
- **Training Records** — register of all staff, volunteers and contractors who have completed hazardous-substance safety training; content of training; dates; next refresher date.
- **Health Surveillance Records (where applicable)** — exposure monitoring data, health-check outcomes, follow-up actions, reassessment dates.
- **Incident & Accident Reports** — records of spills, exposure incidents, near-misses, emergencies; root-cause analyses; corrective actions taken; outcome reviews.
- **Waste Disposal / Waste-Transfer Records** — documentation of hazardous waste disposed of, method of disposal, date, quantity, and disposal certificates / waste-carrier documentation where required.
- **Audit & Review Logs** — dates and outcomes of periodic audits, reviews of risk assessments, inventory checks, policy updates, and any compliance actions taken.

### 2. Retention Periods & Accessibility

- Records must be retained for a minimum period consistent with statutory or regulatory requirements applicable in the relevant jurisdiction (UK, Ireland, Channel Islands).
- As a minimum standard, IGA requires that all hazardous-substance documentation be retained for at least 5 years after last use or disposal of the substance (or longer if local regulation requires).
- Records must be kept in a clear, organised and accessible manner, either electronically (with backup) or as paper-based files stored securely.
- SDS and risk-assessment documentation should be readily accessible to staff, contractors and enforcement or inspection authorities at all times.



### 3. Responsibility for Record Keeping

- The Club / Facility Operator (Employer) has overall responsibility for ensuring record-keeping compliance, including maintenance, storage, updates and disposal of records as required.
- Designated competent persons within each facility should be assigned to manage the hazardous-substance register, update SDS files, file risk assessments, and ensure training and waste-disposal records are maintained.
- IGA (governing organisation) may require periodic submission of anonymised summary records or audit reports from affiliated clubs to monitor compliance and support governance.

### 4. Review and Audit of Documentation

- Clubs must perform annual reviews of all hazardous-substance records to ensure completeness, accuracy, and updating (especially after any incident, new substance introduction, or change of process).
- Any audit by IGA or external health-and-safety authorities must be supported by full, up-to-date records.
- Where deficiencies are identified (e.g. missing SDS, expired documents, missing disposal records), clubs must implement corrective actions promptly and document the remedial steps taken.

### 5. Confidentiality and Data Protection

- Personal medical or health-surveillance records must be stored securely and handled in accordance with privacy and data-protection laws. Access should be restricted to authorised personnel only.
- General safety documentation (inventory, SDS, risk assessments, waste logs) should remain accessible to relevant staff, regulatory authorities, and inspectors as required by law.
- When disposing of records, ensure any personal data is removed or anonymised in compliance with data-protection regulations.

### 6. Transparency & Availability

- A copy of this policy, and summaries or relevant documentation (e.g. SDS, risk assessments) should be available to staff, volunteers, contractors, and, where required, visitors or regulatory inspectors.
- Clubs should make clear who is responsible for record-keeping and who staff should contact if they have queries or concerns about hazardous-substance documentation.

## Audit, Monitoring & Review of Controls

IGA is committed to maintaining a safe environment through continuous monitoring, evaluation and improvement of hazardous-substance management practices. Regular audits, inspections and reviews ensure that control measures remain effective and compliant with legislation.

### 1. Purpose of Auditing & Monitoring

Audits and monitoring activities are conducted to:

- Verify that hazardous-substance risks are being effectively controlled
- Confirm that control measures identified in risk assessments are in place and functioning
- Ensure that policies, SDS, inventory records and documentation are current and complete



- Identify gaps, unsafe practices or areas requiring improvement
- Demonstrate ongoing compliance with legal obligations and IGA requirements

Findings must feed into corrective actions, training updates and risk assessment revisions.

## **2. Types of Audit & Monitoring Activities**

Audits may include:

- Site inspections of storage areas, usage locations and waste-handling spaces
- Review of documentation (SDS, risk assessments, disposal records, training logs)
- Observation of handling practices to confirm safe procedures are being followed
- Staff interviews to confirm awareness and competency
- Verification of control measures, including:
  - PPE availability and correct use
  - Functionality and maintenance of ventilation/engineering controls
  - Condition and usability of spill kits and emergency equipment

Audits should consider both physical controls and behavioural compliance.

## **3. Audit Frequency**

As a minimum standard:

- Annual full audit of hazardous-substance management at each club/facility
- Quarterly checks of key control measures (e.g. PPE, labelling, secure storage)
- Immediate audits triggered by:
  - introduction of new substances
  - changes to processes, volume or frequency of use
  - accidents, incidents or near-misses involving hazardous substances
  - concerns raised by staff or volunteers

Audits should be planned but may also be unannounced to test real-world practice.

## **4. Corrective Actions & Accountability**

Where non-compliance or weaknesses are identified:

- A corrective action plan must be developed with:
  - the issue identified clearly
  - the required action(s)
  - the person responsible
  - a deadline for completion
- Progress must be monitored until fully resolved
- Repeated or serious non-compliance may result in escalation to IGA for investigation and enforcement measures

Actions taken must be documented and retained with audit records.



## 5. Review of Hazard Controls

Following audit findings, incident reports, or new risk information:

- Risk assessments must be reviewed and updated
- Control measures must be improved where current measures are no longer adequate
- Substitution or elimination of hazardous substances should be considered where practicable
- Training and competency programmes must be updated to address identified gaps

Logs of reviews must be maintained as part of the hazardous-substance documentation system.

## 6. Responsibilities

Role	Responsibilities
Club / Facility Operator	Ensures audits are completed as required, leads reviews of controls and oversees implementation of corrective actions
Designated Competent Person(s)	Conducts checks, records findings, updates inventories and documentation
IGA	Sets audit standards, monitors compliance, supports investigations and improvements
Coaches/Staff/Volunteers	Follow control measures, report hazards, cooperate with audits

## 7. Continuous Improvement Commitment

IGA will review this policy and all associated procedures:

- at least annually, and
- following any significant changes in:
  - legislation
  - hazardous substances used
  - operational practices
  - audit or incident outcomes
  - regulatory authority guidance

Lessons learned from audits, incidents and surveillance inform continuous improvement of hazardous-substance safety across all affiliated organisations.





## Local Compliance Addendums

Because IGA and its affiliated clubs may operate across multiple jurisdictions — including the United Kingdom, the Republic of Ireland, and the Channel Islands — adherence to hazardous-substance safety law requires local legal compliance as well as consistent internal safety practices. This section outlines how to apply the core policy in each jurisdiction and highlights variations in law or regulatory expectations.

### 1. United Kingdom (England, Wales, Scotland, Northern Ireland)

- Comply with the Control of Substances Hazardous to Health Regulations 2002 (COSHH), as amended, including all duties on risk assessment, control, SDS management, training, health surveillance, and record keeping.
- Where local jurisdiction within the UK has additional or strengthened regulation (e.g. devolved health & safety law), affiliated clubs must ensure compliance with those local provisions.
- All hazardous-substance inventories, SDS, risk assessments and controls must meet or exceed minimum standards set by COSHH and associated guidance.

### 2. Republic of Ireland

- For any facility, club, or activity based in the Republic of Ireland (or serving persons resident in Ireland under Irish jurisdiction), comply with Irish hazardous-substance law, notably the Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001 (as amended) and any subsequent updates.
- Ensure that chemical-agent inventories, risk assessments, SDS, control measures, PPE, health surveillance and documentation meet Irish regulatory requirements.
- Apply local regulatory standards for labelling, waste disposal or environmental controls that may differ from UK regulations.
- Ensure any contracted waste-carrier or disposal services used in Ireland are licensed under Irish waste-management law.

### 3. Channel Islands (e.g. Jersey, Guernsey)

- Recognise that the UK COSHH Regulations do not automatically apply to the Channel Islands. Instead, local health-and-safety and hazardous-substance legislation must be complied with.
- For any facility under Channel Islands jurisdiction, ensure hazardous-substance management (inventory, SDS, risk assessments, storage, transport, disposal, emergency procedures, training, record-keeping) meets or exceeds local statutory requirements.
- Maintain a specific “Channel Islands Addendum” file for each relevant facility, documenting local legal references, permitted substances, waste-disposal arrangements, and local waste-carriers or disposal authorities.
- Ensure personnel are aware of jurisdiction-specific differences (e.g. permitted methods of disposal, waste-carrier licensing, labelling or import/supply restrictions).



#### 4. Cross-Jurisdiction Use & Transfers

When hazardous substances, equipment, or staff move between jurisdictions (e.g. UK club sends materials to Channel Islands facility, or Irish-based contractor works on a UK site), ensure:

- Inventory entries reflect origin and destination jurisdiction
- SDS and labelling comply with the stricter of source and destination jurisdiction requirements
- Risk assessments and control measures are reviewed in light of local law
- Waste transport or disposal follows the law of the jurisdiction where disposal occurs
- All documentation and records indicate jurisdiction-specific compliance

#### 5. Policy Application and Version Control

- For each facility, maintain a local compliance addendum document linked to the main Hazardous Substances Safety & Compliance Policy, specifying the applicable local law version, local regulatory requirements, and any jurisdiction-specific procedures.
- Before introducing any new hazardous substance, activity or waste disposal practice, verify compliance with both this policy and local jurisdiction law.
- Review local addendums whenever legislation changes in relevant jurisdictions, and communicate updates to all affected clubs, staff and contractors.

#### 6. Responsibility and Oversight

- Club or facility operator is responsible for ensuring local compliance addendum is in place, maintained and followed.
- IGA must provide oversight and support — for example, by maintaining a master list of relevant legislation, changes, and by disseminating updates and guidance to clubs.
- All staff, contractors and volunteers must be informed of relevant jurisdiction-specific requirements when operating under local compliance regimes.

### Policy Review & Update Schedule

This policy must remain accurate, effective and compliant with current legislation. To ensure this, IGA will conduct regular reviews and updates based on legal requirements, operational needs, regulatory changes and audit outcomes.

#### 1. Review Frequency

- This policy will be formally reviewed at least once every 12 months by IGA.
- Additional reviews must take place whenever:
  - relevant legislation, regulatory standards, or industry guidance changes
  - IGA expands into new jurisdictions or introduces new hazardous-substance uses
  - significant incidents, near misses, or audit findings highlight areas requiring revision
  - new scientific or safety information becomes available about a substance used in IGA-affiliated facilities

The review date and version number must be updated with each change.



## 2. Interim Updates

Where immediate changes are needed — e.g., a new substance is introduced or a specific hazard is identified — interim updates must be issued without waiting for the scheduled annual review.

Clubs must implement such updates immediately.

## 3. Responsibilities for Review

- IGA is responsible for:
  - Reviewing the policy content
  - Obtaining legal or specialist advice where required
  - Ensuring updates reflect relevant jurisdictional requirements
  - Issuing revised versions to affiliated clubs
- Clubs and facility operators are responsible for:
  - Implementing the latest version of the policy
  - Updating local addendums, documentation and operational procedures accordingly
  - Confirming compliance when updates are issued

## Contact Information

For any questions regarding this Hazardous Substances Safety & Compliance Policy, or to report concerns related to hazardous-substance management, please contact:

Independent Gymnastics Association (IGA)

✉ Email: [info@igauk.com](mailto:info@igauk.com)

☎ Telephone: [0345 319 7000](tel:03453197000)