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University

UNIVERSITY OF  
Southampton

17-6-2025

# *Craft, care and circularity: Rethinking a just transition for hairdressing*

**Stephanie Hodgson**

PhD Candidate

## **What's to comb:**

- Research context
- Chemicals use and disposal
- Key actions for a just transition



## Personal context







## **Studies where CE intersects with labour practices**

Industry report on  
hairdressing chemicals

*(Rigg & Hodgson, 2023)*

Literature review on CE in  
hairdressing

*(Hodgson et al., 2024)*

Case study on CE  
challenges in hairdressing

*(Hodgson et al., 2025)\**

*\*publication pending*



## Chemicals in hairdressing

Hairdressing professionals regularly handle and dispose of toxic substances.

Exposure often leads to **contact dermatitis** and hand **eczema**.

*(Seité et al., 2023;  
Quaade et al., 2021).*

Alternatives exist but these are seen as less effective.

*(Rigg & Hodgson, 2023)*





## Colour management systems

Salons reportedly waste 25% - 40% of hair color.

*(Morris, 2022)*

Colour management systems can reduce inventory purchases by up to 40%.

*(SmartMix, 2025)*



## Supplier misalignment

Suppliers often require minimum order volumes and pressure salons to increase purchase orders.

*"These big brands have got such a **chokehold** on us."*

*(Hodgson et al., 2025)*



# Limited regulation around safe practices

Ongoing training on safe handling and disposal isn't required and many don't receive it.

64.4% of salons lack a COSHH register even though it is a legal requirement.

(Rigg & Hodgson, 2023)

## COSHH

**IS IT COSHH OR NOT?**

**WHAT IS A SUBSTANCE HAZARDOUS TO HEALTH UNDER COSHH?**

Under COSHH there are a range of substances regarded as hazardous to health including:

- Substances or mixtures of substances classified as dangerous to health under the classification, labelling and packaging of substances and mixtures (CLP) Regulation. Their warning label can identify these and the supplier must provide a safety data sheet for them.

**LOOK FOR THESE SYMBOLS:**

- If biological agents, bacteria and other micro organisms, are directly connected with work, such as farming, sewage treatment, or healthcare, or if the exposure is incidental to the work (e.g. exposure to bacteria from an air conditioning system that is not properly maintained).
- Any kind of dust if its average concentration in the air exceeds levels specified in COSHH.
- Any other substances which creates a risk to health, but which for technical reasons may not be specifically covered by CLP including: pesticides, medicines, cosmetics or substances produced in a chemical process.

**WHAT IS NOT A SUBSTANCE HAZARDOUS TO HEALTH UNDER COSHH?**

For the vast majority of commercial chemicals, the presence or not of a warning label will indicate whether COSHH is relevant. For example, there is no warning label on ordinary household washing up liquid, so if its used at work you do not have to worry about COSHH but there is a warning label on bleach, and so COSHH does apply to its use in the workplace.

**1. ASSESS THE RISKS**

This risk assessment must:

- Identify the hazardous substances present in your workplace.
- Consider the risks these substances present to people's health.
- Identify and consider who could be exposed to the substance and how often?

Remember to include all groups of people who come into contact with the substance.

Whoever carries out the assessment will need to have access to and understand the COSHH Regulations and relevant Approved Codes of Practice.

**2. DEVELOP PRECAUTIONS**

**DECIDE ON WHAT PRECAUTIONS ARE NEEDED TO PREVENT OR ADEQUATELY CONTROL EXPOSURE**

**a. Prevent exposure**

The COSHH Regulations require you to prevent exposure to substances hazardous to health, if it is reasonably practicable to do so.

**b. Adequately control exposure**

If prevention is not reasonably practicable, you must adequately control exposure.

Such as:

- Use work systems and engineering controls, and provide suitable work equipment to reduce exposure.
- Control exposure at source and reduce the number of exposed employees to a minimum and the level and duration of their exposure.
- The quantity of hazardous substances used or produced in the workplace.

**3. IMPLEMENT CONTROL MEASURES**

**USING THE CONTROL MEASURES**

COSHH requires employees to make proper use of control measures and to report defects. This is why employees must be suitably trained, have suitable information and appropriate supervision.

**MAINTAINING CONTROL MEASURES**

COSHH places specific duties on the need to ensure that exposure controls are maintained. This is to ensure that every part of the control measure continues to be met as originally intended.

**4. MONITOR EXPOSURE**

Under COSHH you must measure the concentration of hazardous substances in air if:

- There could be a serious risk to health if any control measures failed or deteriorated.
- Exposure limits might be exceeded or control measures might not be working properly.

Air monitoring must be carried out when employees are exposed to certain substances and processes specified in Schedule 5 to the COSHH Regulations.

**5. CARRY OUT HEALTH SURVEILLANCE**

**COSHH REQUIRES HEALTH SURVEILLANCE TO BE CARRIED OUT IN THE FOLLOWING CIRCUMSTANCES:**

- Where an employee is exposed to one of the substances listed in Schedule 6 to COSHH and is working in one of the related processes, e.g. in the manufacture of certain compounds where there is reasonable likelihood that an identifiable disease or adverse health effect will result from that exposure.
- Where employees are exposed to a substance linked to a particular disease or adverse health effect and there is a reasonable likelihood, under the conditions of the work, of that disease or effect occurring and it is possible to detect the disease or health effect.

**6. INFORM, INSTRUCT & TRAIN**

**ENSURE EMPLOYEES ARE PROPERLY SUPERVISED INFORMED AND TRAINED**

COSHH requires the provision of suitable and sufficient information and training for all employees which should include:

- The main findings of any risk assessment.
- The names of the substances they work with or could be exposed to and the risks created by exposure.
- Access to any data sheets that apply to those substances.

The precautions they should take to protect themselves and other employees.

- How to use personal protective equipment and clothing provided.
- The results of any exposure monitoring and health surveillance.
- The emergency procedures that need to be followed.

**7. PREPARE PLANS & PROCEDURES**

**PREPARE PLANS AND PROCEDURES TO DEAL WITH ACCIDENTS, INCIDENTS & EMERGENCIES.**

COSHH requires a plan outlining the response required before an accident happens.

The plan must include:

- Preparing procedures and setting up warning and communication systems to enable an appropriate response immediately any incident occurs.
- Ensuring that the information on the emergency arrangements is available to those who need to see it including the emergency services.
- If any accident or emergency occurs all steps required must be taken to minimise the harmful effects and restore the situation to normal immediately.
- Employees who may be affected must also be informed.
- Only those staff necessary to deal with the incident may remain in the area and they must be provided with appropriate safety equipment.
- It also requires safety drills to be practised at regular intervals.

A.C. SAFETY FIRST AID GROUP LTD 2014

The information contained in the poster is for guidance only and should not be used as a substitute for recognised training.

A704 (REV 06/14)



## Glove use to mitigate exposure to chemicals

Gloves protect against contact dermatitis BUT they are often disposable and non-recyclable.

Reusable gloves last for months BUT affect grip and technique.

Bio-based gloves can be composted BUT are flimsy and incompatible for colour work.

*(Hodgson et al., 2025)*



## Salons within a larger social ecosystem

An unsafe working environment can burden the healthcare system.

*(Driscoll et al., 2025)*

Preventative measures in salons can prevent downstream waste and resource strain.

*(Hodgson et al., 2024)*





## Salons within a larger economic ecosystem

Hairdressing is a 'supplier-dominated service' industry.

*(Castellacci, 2018)*

Salons are reliant on the market for access to safe, effective and affordable products/tools.

*(Hodgson et al., 2025)*





## Regulation on disposal

Legal requirements exist but awareness is inconsistent and checks are rare.

50% of salons reported pouring excess colour or developer **down the sink.**

*(Rigg & Hodgson, 2023)*





## Chemical recycling

Reliable data on chemical colour waste is scarce.

Waste to energy outperforms chemical recycling for colour waste.

*(Rigg & Hodgson, 2023)*



*Misalignment:  
Craft, care, circularity*





## Ongoing training to prevent harm

Mandatory, subsidised training on safe procedures is needed...beyond vocational education.





## Mainstreaming of official guidance

Greater **visibility** of guidelines on chemical safety and **integration** into everyday practice are needed.





## Clear industry signalling

Collective bargaining is an opportunity to coordinate and shift expectations upstream.





## Policy to steer supplier reform

Policy must steer suppliers towards safe, circular and affordable options with professional use in mind and away from volume-based models.





## Key actions for a **just transition** in hairdressing

- Mandatory, subsidised training on safe procedures is needed beyond vocational education.
- Greater visibility of guidelines on chemical safety and integration into everyday practice are needed.
- Collective bargaining is an opportunity to coordinate and shift expectations upstream.
- Policy must steer suppliers towards safe, circular and affordable options and away from volume-based models.



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*shaping tomorrow*



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