CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH) POLICY

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<th>First Issued by/date</th>
<th>Issue Version</th>
<th>Purpose of Issue/Description of Change</th>
<th>Planned Review Date</th>
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<td>BKW PCT March 2005</td>
<td>3</td>
<td>Revised update to unify policy systems across new organisation/Periodic Policy Review KPIs added.</td>
<td>May 2010</td>
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<th>Named Responsible Officer:</th>
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<th>Date</th>
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<td>Health &amp; Safety Advisor</td>
<td>Health Safety &amp; Welfare Committee</td>
<td>May 2008</td>
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<th>Impact Assessment Screening Complete-Date</th>
<th>Full Impact Assessment Required – No</th>
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<td>Health &amp; Safety Policy</td>
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KPIs:

i) COSHH register available and up to date

ii) COSHH assessments completed and evidence that staff using or coming into contact with substances are aware of findings

iii) Inspections of control measures e.g. storage and use are recorded
NHS Wirral

Control of Substances Hazardous to Health (COSHH) Policy

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NHS WIRRAL
CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH
(COSHH) POLICY

1.0 Introduction

The COSHH Regulations 2002 and approved code of practice require employers to evaluate and control the risks which employees and others may be exposed to from hazardous substances at work.

It applies to all workplaces and includes any substances, materials, processes or by-products that are hazardous to health e.g. clinical waste, microbiological agents, dusts of any kind in substantial quantities and all chemicals categorised as hazardous to health in any form i.e. solid, liquid, gas or vapour.

The health effect of hazardous substances is directly linked to:

i) the nature of the substances
ii) duration of exposure
iii) quantity exposed to.

2.0 Scope of the Policy

This policy applies to all employees as well as those patients, visitors, contractors and members of the public who come into contact with hazardous substances used or produced by NHS Wirral

3.0 Definitions

“Substance hazardous to health” means anything:-

i) listed as dangerous for supply within the Chemical (Hazard Information and Packaging for Supply) Regulations (CHIP Regulations) and which indicates specified dangers as:
   very toxic, toxic, harmful, corrosive or irritant

ii) with a workplace exposure limit approved by the Health & Safety Commission (HSC)

iii) which is a biological agent

iv) which is dust of any kind in sufficient quantity (10mg/m$^3$ over 8 hr period for inhalable dust or 4mg/m$^3$ over 8 hr period for respirable
dust)
v) which is present in the workplace and which creates a risk to health e.g. micro-organisms, allergens etc.

4.0 Policy Aim

The aim of the policy is to:

a) Assess the risk to health that may arise from exposure to hazardous substances.

b) Establish precautions and control measures needed appropriate to the risk. Wherever possible, risks should be eliminated.

c) Monitor control measures to ensure they are adhered to and working properly. This includes maintenance and testing of any equipment involved e.g. local exhaust ventilation systems.

d) Monitor the extent to which employees are exposed to hazardous substances and carry out health surveillance where necessary.

e) Inform, instruct and train employees regarding the hazards, risks and precautions needed.

5.0 Responsibilities

5.1 The Chief Executive is responsible for:

a) Ensuring the effective implementation of this Policy

b) Allocating sufficient resources to enable the Policy to be delivered

c) Monitoring the overall effectiveness of the Policy

5.2 Heads of Service/Leads are responsible for ensuring that:

a) substances hazardous to health are identified and assessments of the associated risks to health are carried out within their Service by nominated, appropriately trained, competent people.

b) appropriate resources are available to support safe working practice and take into account appropriate control measures

c) health surveillance is undertaken, as appropriate, in accordance with assessment findings.
d) assessments are reviewed annually or more frequently if circumstances change

5.3 **Line Managers** are responsible for:

a) identifying all hazardous substances within their area and recording with a COSHH inventory

b) ensuring material safety data sheets are available for reference

c) identifying, nominating and supporting the COSHH assessor(s) through training. Ensuring that assessors have a good knowledge of working procedures and practices

d) ensuring that assessments are recorded using the NHS Wirral documentation

e) supporting the assessment process and its outcome by ensuring that any necessary control measures and / or resource requirement are met.

f) determining best method(s) of information collation and effectively communicating assessment findings

g) monitoring employee compliance with assessments and identified control measures

h) ensuring that any untoward incidents involving hazardous substances are reported, investigated and managed in accordance with the Trust’s Incident Reporting Policy and the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations (RIDDOR) 1995.

5.4 **Nominated Assessors** are responsible for:

a) attending training to enable them to undertake their role as COSHH assessor

b) carrying out assessments and developing appropriate control measures and safe systems of work

c) reporting any health surveillance requirements to the Occupational Health Department
d) prioritising reviewing and revising assessments as necessary and at least annually

e) recording assessments using ‘Inventory’ and ‘Comprehensive Assessment’ documentation (appendix 1 and 2: HS 7 (1) and HS 7 (2) respectively

f) submitting the above documentation to the line manager

g) raising concerns with line manager

5.5 **Employees** have a responsibility to:

a) follow the safe system of work identified in the assessments

b) make full and proper use of control measures including personal protective equipment

c) report any compliance failures, digressions, defects or concerns to their line manager

d) report accidents and incidents

e) attend training as required

f) inform their line manager of any health concerns which could reasonably be attributed to exposure to hazardous substances

g) attend for health surveillance as required

6.0 **COSHH Risk Assessment**

COSHH assessments should take a systematic approach by considering all factors relating to the use of substances hazardous to health

The assessment must also include reference to any emergency plans or procedures e.g. dealing with fire, spillage or first aid

They must clearly show all the control measures put in place either to prevent exposure or to achieve and maintain adequate control of exposure.

Assessments must be working documents, copies of which must be kept readily available for reference
Where assessments require further control measures to be put in place, an action plan must be developed with responsibilities clearly allocated and actions timed.

Re-assessment must be undertaken whenever there are significant changes to: the substance’s data sheet; the quantity or way in which it is used or if there is reason to suspect that health is being adversely affected.

### 7.0 Control Measures

7.1 Control measures must be determined by the level of risk to health and must take into account:

- **a)** elimination and/or use of alternative, less hazardous substances and materials where possible

- **b)** modification of the use or process to eliminate, isolate or reduce exposure

- **c)** elimination and/or reduction of numbers of people exposed to the hazardous substance

- **d)** the outcome of any environmental monitoring, as appropriate, which has been undertaken by a competent person

- **e)** the provision, maintenance and use of any control equipment required

- **f)** the use of personal protective equipment (PPE) to reduce or control exposure to hazardous substances/materials. PPE should be regarded as a ‘last resort’ in providing protection from exposure to substances hazardous to health

7.2 Failure to comply with the identified control measures may result in disciplinary action

7.3 Managers are responsible for ensuring that PPE, as required, is suitable for its intended purpose, appropriately maintained, cleaned, inspected, stored and replaced as required.

7.4 Employees are required to use PPE provided in accordance with the training they have been given and report any faults/defects or concerns regarding PPE to their manager
7.5 Any physical control measures put in place as a result of assessments e.g. local exhaust ventilation systems must be inspected and maintained to ensure their effectiveness.

8.0 PURCHASING PROCEDURES

8.1 All purchases of goods and substances must be undertaken in accordance with recognised and agreed procedures. No other purchasing approaches should be adopted.

8.2 Manufacturers and suppliers of substances and materials have a legal duty to supply material safety data sheets for the materials provided. All purchases/ requisitions should include a request to supply data information sheets.

8.3 Line managers must ensure an assessment has been carried out PRIOR to any use or handling of the substance

9.0 HEALTH SURVEILLANCE

9.1 COSHH places a duty on NHS Wirral to provide suitable health surveillance 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, or that disease or effect occurring and it is possible to detect the disease or health effect.

9.2 Health surveillance will be managed by Cheshire & Wirral Partnership NHS Foundation Trust’s (CWP) Occupational Health Service, conducted by a suitably competent person and will be appropriate to the identified risk.

9.3 The Occupational Health Service will maintain appropriate COSHH health surveillance records as required by legislation.

9.4 Individual health surveillance health records will be made available to the individual employee should they wish to access them.

10.0 INFORMATION AND TRAINING

NHS Wirral will ensure that employees receive the necessary level of training for them to fulfil their individual responsibilities identified in this policy.
Employees must be informed of:
the substances they work with
the findings of risk assessments
precautions to be taken to protect themselves and others
how to use PPE
results of any health surveillance
emergency procedures to be followed

11.0 MONITORING & REVIEW

Adherence to this policy should be monitored by a combination of local inspections and audits.

Any accidents and incidents involving substances hazardous to health must be reported according to NHS Wirral’s accident incident reporting policy and must be suitably investigated.

Significant findings of inspections, audits or investigations should be used to determine any remedial actions required, including necessary changes to the policy or safe systems of work.

12.0 OTHER RELATED DOCUMENTATION

12.1 Where necessary, this policy should be read in conjunction with NHS Wirral’s Health & Safety Policy Statement and the Organisation and Responsibilities policy. It should also be read in conjunction with NHS Wirral’s Risk Assessment Policy.

12.2 Relevant Legislation:

- The Health & Safety at Work Etc Act 1974
- The Management of Health & Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health Regulations 2002
- The Chemical Hazard Information & Packaging Regulation 1994 (CHIP 2)
- Health & Safety Executive’s EH 40 Occupational Exposure Limits
- Personal Protective Equipment Regulations 2002
Appendix 1

NHS WIRRAL
COSHH INVENTORY FORM HS 7 (1)

Service Area: ___________________________ ___________________________

Site and Location: ___________________________________________________

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<thead>
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<th>Hazardous Substance</th>
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COSHH Assessment Form

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<td>Form e.g. liquid, gas etc?</td>
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COSHH Policy
11/12
Develop a COSHH inventory
Collate Material Safety Data Sheets (MSDS's) in a file. Keep them up to date

Identify the potential hazards/risks from MSDS's

Identify who may be harmed i.e. Staff/Contractors Patients/Carers

Look at how the substances are actually used i.e. the method of use, the frequency and quantities exposed to and record these on the assessment

Record the control measures which need to be in place. Consider: Elimination, Reduction, Isolation and Control of the hazard(s)

Identify any personal protective equipment (PPE) which must be used to control risk. Identify emergency measures needed i.e. first aid, fire and spillage

Document the significant findings in a COSHH risk assessment; formally communicate to all relevant staff

Review your COSHH assessment within a reasonable period of time i.e. at least annually or if something changes