

Livewell Southwest

Control of Substances Hazardous to Health (COSHH) Policy

Version No 2.6

Notice to staff using a paper copy of this guidance

The policies and procedures page of LSW intranet holds the most recent version of this document and staff must ensure that they are using the most recent guidance.

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Reader Information

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	<ul style="list-style-type: none"> http://www.hse.gov.uk/chip/index.htm • HSE COSHH Website: http://www.hse.gov.uk/coshh/ • HSE COSHH A Brief Guide to the Regulations: http://www.hse.gov.uk/pubns/indg136.htm • CAS – Central Alerting System • https://www.cas.dh.gov.uk HSE A short guide to the Personal Protective Equipment at Work Regulations 1992 http://www.hse.gov.uk/pubns/indg174.pdf • Health Protection Agency web page on Chemicals and poisons http://www.hpa.org.uk/ • Advisory Committee on Dangerous Pathogens (ACDP) website is: http://www.hse.gov.uk/aboutus/meetings/ • HSE information and guidance on biological hazards at work http://www.hse.gov.uk/biosafety/information.htm • HSE Workplace Exposure Limits EH40/2005 http://www.hse.gov.uk/pubns/books/eh40.htm • ECHA – European Chemicals Agency website: http://www.echa.europa.eu • Wikipedia website: https://en.wikipedia.org
Associated documentation	<ul style="list-style-type: none"> • Risk Management Strategy • Health and Safety Policy • Incident Reporting & Investigation Policy and Procedure • Serious Incidents Requiring Investigation Policy • Fire Safety Policy • Infection Prevention & Control Policies and all associated approved documents • Latex (Management of) Policy • Legionella Bacteria Control Policy • Safe and Secure Handling of Medicines • Safe Handling & Disposal of Healthcare Waste • Business Continuity & Service Recovery Policy • Decontamination (Disinfection & Cleaning) Guidelines & Procedures • Sickness Policy
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Control of Substances Hazardous to Health (COSHH) Policy

1. Introduction

1.1 Livewell Southwest (hereafter referred to as “LSW”) has a duty to protect workers, service users and members of the public who might be exposed to hazardous substances which have the potential to cause harm by direct contact, airborne contact or other method of contamination associated with healthcare work environments and working practices, and to ensure that any associated risks are assessed and reduced so far as is reasonably practicable.

1.2 This policy describes LSW’s management organisation and arrangements for ensuring compliance with the Control of Substances Hazardous to Health Regulations (as amended) (COSHH) and Approved Codes of Practice including General Control of Substances Hazardous to Health (COSHH), Carcinogens and Biological Agents and should be read in conjunction with LSW’s Health and Safety Policy.

1.3 Statement of Policy

1.3.1 Within healthcare, employees, patients and others can encounter a wide range of substances capable of damaging their health. The term “substances” refer not only to chemical agents but include biological agents such as bacteria or viruses. Work processes involving body fluids, handling and disposal of clinical waste, pathology specimens and larval therapy should be assessed under the COSHH Regulations.

1.3.2 The COSHH Regulations are intended to prevent workplace disease resulting from exposure to hazardous substances for all persons at work and others who may be affected by such work. They require:

- a) An adequate assessment of the risks to health arising from work activities associated with hazardous substances.
- b) The introduction of adequate control measures.
- c) Maintenance, examination and testing of control measures and equipment associated with them.
- d) Monitoring the effectiveness of the measures and the health of employees.
- e) Instruction, information, training and supervision.
- f) Review of risk assessment following any change in use or circumstance.
- g) Arrangements to deal with accidents and emergencies.

1.3.3 The Regulations cover virtually all substances hazardous to health including solids, liquids, dusts, fumes, vapours, gases or micro-organisms, natural materials, compounds, asphyxiates and biological agents.

1.3.4 Excluded from the COSHH Regulations are Asbestos at Work, Control of Lead at Work, Ionising Radiation, explosive or flammable properties, or solely because it is at a high or low temperature or a high pressure, as all of these have their own specific legislation.

- 1.3.5 The Regulations set out a hierarchy of measures that employers and employees have to take. Failure to comply with COSHH, in addition to exposing employees and patients to risk, constitutes an offence and is subject to penalties under the Health and Safety at Work Act 1974.
- 1.3.6 All potentially exposed employees will be provided with health surveillance if appropriate and information, instruction and training on the nature and likelihood of their exposure to substances hazardous to health and on the appropriate control measures to be taken.
- 1.3.7 The implementation of this policy requires the total co-operation of all members of management and staff.

2 Purpose

- 2.1 The purpose of this policy is to detail the arrangements for the implementation of the Control of Substances Hazardous to Health Regulations within LSW.

3 Definitions (see Appendix A for full list)

- 3.1 As stated in the Control of Substances Hazardous to Health Regulations a “substance hazardous to health” means a substance (including preparation):
 - a) which is listed in Table 3.2 of part 3 of Annex V1 of the European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP) and for which an indication of danger specified for the substance is very toxic, toxic, harmful, corrosive or irritant;
 - b) for which the Health and Safety Executive has approved a workplace exposure limit – see EH40/2005 document for workplace exposure limits;
 - c) which is a biological agent;
 - d) which is a dust of any kind;
 - e) which, not being a substance falling within sub-paragraphs (a) to (d) above, but which because of its chemical or toxicological properties and the way it is used or is present at the workplace creates a risk to health.

4 Duties & Responsibilities

- 4.1 The general responsibilities of the **Board and Chief Executive** as they relate to COSHH are described in LSW’s Health and Safety Policy.
- 4.2 The **Director of Professional Practice, Safety and Quality** has corporate responsibility for Health and Safety Management and, therefore, takes specific responsibility for:

- 4.2.1 Advising the Board on the review of existing policy arrangements.
- 4.2.2 Advising the Board on the allocation of resources to implement health and safety procedures.
- 4.2.3 Referring matters of a critical nature to the Board for resolution via the Corporate Risk Register.
- 4.2.4 Ensuring adequate safety arrangements exist within LSW.
- 4.3 **Locality Managers / Service Managers** are responsible for ensuring that COSHH risk assessments are undertaken within their area of responsibility. The undertaking of COSHH assessments may be delegated to a local Health and Safety Risk Assessor, however the responsibility remains with the Service Manager as explained in LSW's Health & Safety Policy and Risk Management Strategy.
 - 4.3.1 Service Managers, with assistance from local Health and Safety Risk Assessors, are to:
 - a) Ensure all risk assessments are reviewed regularly and following any changes.
 - b) Ensure all new systems of work or procedures that involve or expose staff, patients, service users or others to hazardous substances are assessed.
 - c) Identify and implement any action or control measure required following the COSHH risk assessment. Further advice may be sought from Infection Prevention and Control Team, Occupational Health & Wellbeing Service or the Corporate Risk and Compliance Department.
 - d) Ensure control measures are used and maintained properly and that safety procedures are followed, i.e. the correct use of personal protective equipment such as gloves.
 - e) For those substances with workplace exposure limits (WEL – see Appendix A), ensure that monitoring of exposure levels is carried out – contact the Corporate Risk and Compliance Department for assistance.
 - f) Ensure that employees are given the necessary information, instruction and training to enable them to manage hazardous substances.
 - g) Refer employees to Occupational Health & Wellbeing as soon as symptoms thought to be associated with hazardous substances manifest themselves, or where health surveillance may be required.
- 4.4 **Local Health and Safety Risk Assessors** will be responsible for:
 - 4.4.1 Attending risk / COSHH assessment training, including update and refresher sessions.
 - 4.4.2 Completing or updating an inventory of all hazardous substances within their area of responsibility and reviewing and revising as necessary (at least annually, but following any change whichever is sooner).

- 4.4.3 Conducting suitable and sufficient assessments of the risks to health arising from the use, handling, storage and disposal of hazardous substances using the SHE assessment software (see Section 7).
- 4.4.4 Reviewing assessments whenever there have been any significant changes in the matters to which they relate or there is a reason to suspect that they are no longer valid. Assessments should be reviewed **at least** once every two years.
- 4.4.5 Assisting their senior managers in the development of safe systems of working.
- 4.4.6 Liaise with the Corporate Risk and Compliance Department, Infection, Prevention & Control Team or Occupational Health & Wellbeing, and others as required.
- 4.5 All **employees** are responsible for:
 - 4.5.1 Complying with this policy, or to raise any issues or concerns with the wearing of PPE with relevant line manager/supervisor.
 - 4.5.2 Following the local procedures and safe systems of work, instruction and training when using hazardous substances.
 - 4.5.3 Taking reasonable care when working with hazardous substances, including dealing appropriately with hazardous waste.
 - 4.5.4 Reporting all incidents of significant exposure to hazardous substances, in accordance with LSW's Incident Reporting & Investigation Policy and Procedure.
 - 4.5.5 Co-operating with their Service Manager in complying with any health surveillance requirements identified by the COSHH risk assessment and Staff Health & Wellbeing.
- 4.6 Under the Service Level Agreement arrangement **Occupational Health & Wellbeing**, must ensure the following functions are provided:
 - 4.6.1 Pre-placement health assessment and screening.
 - 4.6.2 Advise Service Managers and employees of any necessary adjustment or restrictions to their work activities.
 - 4.6.3 Provide health surveillance (including follow-up) if required, i.e. legal requirements, good practice or as identified following risk assessment.
- 4.7 The **Health and Safety Advisor** will ensure that the following functions are provided:
 - 4.7.1 Advice to managers regarding COSHH and COSHH assessment in accordance with all Regulations, guidance and directives.

- 4.7.2 Advice on occupational hygiene monitoring services to ensure effectiveness of control measures and compliance with workplace exposure limits.
- 4.7.3 COSHH training for local Health and Safety Risk Assessors.
- 4.8 The **Infection Prevention & Control Team** will provide expert advice on the risk from microbiological agents, corporately or as and when requested.
- 4.9 Responsibilities for **Contractors**:
 - 4.9.1 As part of the tendering process, reference will be made to the arrangements for effectively managing the risks associated with hazardous substances, including risk assessment, training, provision and maintenance of control measures, communication of information (such as substances used) and record keeping.
 - 4.9.2 It is the responsibility of all LSW Service Managers to liaise with a representative of the contractor on all work involving hazardous substances, and ensure co-operation and co-ordination.
 - 4.9.3 Contractors will reduce the risk as far as is reasonably practicable from exposure to hazardous substances to LSW employees, visitors, patients, service users and any other contractors where they anticipate the use of hazardous materials. A suitable and sufficient risk assessment will be provided, and brought to the attention of the appropriate Service Manager. All information will be communicated to staff and others likely to be affected.

5 COSHH Risk Assessment

- 5.1 The COSHH Regulations require an assessment of risk to be undertaken for hazardous substances, together with an annual audit as detailed the self-audit section of the Risk Management Workbook. Service Managers must arrange for a full risk assessment to be undertaken, normally by a local Health and Safety Risk Assessor. The procedure to undertake a COSHH risk assessment can be followed by using the on-line COSHH Risk Assessment tool at SHE website <https://sheassure.net/plymouthpct> - contact the Corporate Risk and Compliance Department for further information and training.

6 Procurement

- 6.1 Any new substances must be procured via the approved purchasing process. All substances are required to be COSHH assessed before use – contact the Corporate Risk and Compliance Department for further information and training.

7 Training, Information and Instruction

- 7.1 Following the completion of a COSHH risk assessment, the need for information, instruction, supervision and training must be considered and appropriate arrangements made by the Service Manager. These might range from a simple instruction to regular formal training sessions.
- 7.2 Wherever employees are exposed to hazardous substances, they must receive information, instruction, supervision and, where appropriate, training for the following:
- a) The risks to health created by exposure;
 - b) The precautions that should be taken;
 - c) Control measures - their purpose and how to use them;
 - d) How to use personal protective equipment and clothing provided;
 - e) Results of any exposure monitoring and health surveillance.
- 7.3 Employees should also be made aware of the arrangements for COSHH compliance within the team / service / unit so that they can play an active part in improving health and safety standards.
- 7.4 Local health and safety Risk Assessors will receive training for undertaking COSHH risk assessments by the Corporate Risk and Compliance Department.

8 Health Surveillance

- 8.1 Occupational Health & Wellbeing will advise on routine surveillance of individual health to be undertaken following consideration of the degree of exposure and the nature of the effects, i.e. exposure to latex, etc. This must be recorded on the relevant COSHH risk assessment.
- 8.2 Occupational Health & Wellbeing will undertake health surveillance procedures and will retain records for 40 years.

9 Emergency Arrangements

- 9.1 Where the risks of a chemical escaping are high (i.e. spillage of clinical waste) or where a substance is especially hazardous (i.e. mercury), Service Managers will ensure that emergency arrangements are known and in place as part of the risk assessment and contingency planning process. Details for appropriate emergency management can be found on the suppliers Safety Data Sheet. Emergency arrangements must include the reporting of incidents as explained in LSW's Incident Reporting & Investigation Policy and Procedure.
- 9.2 Any significant exposure to a substance must be reported to the Health & Safety Executive (HSE), following the Reporting of Incidents, Disease and Dangerous

Occurrences Regulations (RIDDOR) 2013. This contact will be made by the Corporate Risk and Compliance Department.

10 Implementation

- 10.1 It is mandatory that all staff attend staff induction. During this training staff are made aware of the Risk Management Strategy and health and safety policies, together with the requirement to undergo training. Also, staff must undertake local induction.
- 10.2 Employees working with identified substances hazardous to health will work with local Health and Safety Risk Assessors to produce risk assessments, and receive suitable and sufficient information, instruction and training in the use of such substances from them with additional support, as appropriate, from the Corporate Risk and Compliance Department, Infection Prevent & Control Team or Occupational Health & Wellbeing.

11 Monitoring

- 11.1 Monitoring of this policy will be local undertaking of health and safety self-audits, one of which includes COSHH, within the Risk Management Workbook. The Corporate Risk and Compliance Department will monitor the organisation's overall compliance with health and safety arrangements via regular audits.
- 11.2 This policy will be reviewed every three years or sooner should there be a significant change, or where indicated to be necessary by the issue of further guidance from the Health and Safety Commission, the Health and Safety Executive and/or the Department of Health.

All policies are required to be electronically signed by the Lead Director. Proof of the electronic signature is stored in the policies database.

The Lead Director approves this document and any attached appendices. For operational policies this will be the Locality Manager.

The Executive signature is subject to the understanding that the policy owner has followed the organisation process for policy Ratification.

Signed: Director of Professional Practice Safety & Quality

Date: 11th December 2015

COSHH Definitions

Hazard - the adverse consequence to health whether immediate or delayed arising from exposure with a biological, chemical, physical substance or process.

Risk - the risk from a substance is the likelihood that it will harm people in the actual circumstance of use.

Assessment - a written record of the evaluation of risks to health and any necessary control measures to remove or reduce risk.

Contractors - include all employees and contractors (including employees of sub-contracted contractors) engaged by LSW.

Workers - includes all directly employed staff regardless of hours worked, bank and agency staff and volunteers.

Biological Agent - any micro-organism, cell culture or human endo parasite, including any that have been genetically modified, which may cause any infection, allergy, toxicity or otherwise create a hazard to human health.

Biological agents are categorised according to hazard and categories of containment:

- Group 1: Unlikely to cause human disease.
- Group 2: Can cause human disease and may be a hazard to employees – it is unlikely to spread to the community and there is usually effective prophylaxis or treatment available.
- Group 3: Can cause severe human disease and may be a serious hazard to employees – it may spread to the community, but there is usually effective prophylaxis or treatment available.
- Group 4: Causes severe human disease and is a serious hazard to employees, it is likely to spread to the community and there is usually no effective prophylaxis or treatment available.

Very Toxic/Toxic - a substance which if inhaled or ingested or penetrates the skin, may involve extremely serious/serious acute or chronic health risks and death.

Harmful - a substance which if it is inhaled or ingested or penetrates the skin may involve limited health risks.

Corrosive - substances that may on contact with living tissue destroy them.

Irritant - a non-corrosive substance that, through immediate, prolonged or repeated contact with the skin or mucous membrane can cause inflammation.

Carcinogenic - a substance which if it is inhaled or ingested or penetrates the skin may induce cancer or increase its incidence.

Teratogenic - a substance which if it is inhaled or ingested or penetrates the skin, may involve a risk of subsequent non-hereditary birth defects in offspring.

Mutagenic - a substance that if it is inhaled or ingested or it penetrates the skin, may involve a risk of hereditary genetic defects.

Safe System of Work - is a formal procedure which results from systematic examination of a task in order to identify all the hazards. It defines safe methods to ensure that hazards are eliminated or risks are minimised.

CLP - is the acronym of the European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures and for which an indication of danger specified for the substance is very toxic, toxic, harmful, corrosive or irritant. The CLP regulations are of concern primarily to suppliers, and require that they classify, label, and package substances and mixtures by:

- Establishing the potential risk to human health and the environment
- Classifying substances and mixtures in line with the identified hazards
- Labelling according to a standardised system so that workers and consumers know about their effects before they handle them

GHS – is the acronym for United Nations Globally Harmonising System of Classification and Labelling of Chemicals. The GHS is a single worldwide system for classifying and communicating the hazardous properties of industrial and consumer chemicals.

GHS hazard pictograms

A brief description is given here for information purposes only.



- Acute toxicity, Very toxic (fatal), Toxic etc



- Gases under pressure



- Harmful skin irritation, serious eye irritation



- Flammable gasses, flammable liquids, flammable solids, flammable aerosols, organic peroxides, self-reactive, pyrophoric, self-heating, contact with water emits flammable gas



- Explosive, self-reactive, organic peroxide



- Harmful to the environment



- oxidising gases, oxidising liquids, oxidising solids



- Respiratory sensitiser, mutagen, carcinogen, reproductive toxicity, systemic target organ toxicity, aspiration hazard



- Corrosive (causes severe skin burns and eye damage), serious eye damage

Hazard Statement – form a set of standardised phrases about the hazards of chemical substances and mixtures

Precautionary Statement – form a set of standardised phrases giving advice about the correct handling of chemical substances and mixtures

Signal word – is required for labelling, either “warning” or “danger” depending on the severity of the hazard

WEL – is an acronym for “**workplace exposure limit**”, which is an upper limit on the acceptable concentration of a hazardous substance in workplace air for a particular material or class of materials. **EH40/2005** – is the HSE’s approved list of approved workplace exposure limits.

RIDDOR – is an acronym for Reporting of Incidents, Diseases and Dangerous Occurrences Regulations. The Corporate Risk and Compliance Department assumes responsibility for reporting RIDDORs.

In relation to this policy, reportable major injuries include:

- (a) loss of sight (temporary or permanent);
- (b) chemical or hot metal burn to the eye, or any penetrating injury to the eye;
- (c) unconsciousness caused by asphyxia or exposure to harmful substance or biological agent;

- (d) acute illness;
- (e) acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.
- (f) serious burns (including scalding) which:
 - covers more than 10% of the body
 - causes significant damage to the eyes, respiratory system or other vital organs

In relation to this policy, reportable diseases include:

- (a) certain poisonings;
- (b) some skin diseases such as occupational dermatitis, skin cancer, chrome ulcer, oil folliculitis/acne;
- (c) lung diseases including: occupational asthma, pneumoconiosis, asbestosis, mesothelioma;
- (d) infections such as: leptospirosis; hepatitis; tuberculosis; anthrax; legionellosis and tetanus;
- (e) other conditions such as: occupational cancer; diseases associated with biological agents

SHE – refers to LSW's COSHH database; health and safety software provided by SHE Software Ltd.

PPE – refers to Personal Protective Equipment, i.e. disposable gloves, aprons, goggles, etc

Health Surveillance - means the assessment of the state of health of an employee, as related to exposure.