

## CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH POLICY (COSHH)

<b>Document Reference No:</b>	PTHB HSP 013	
<b>Version No:</b>	5	
<b>Issue Date:</b>	October 2023	
<b>Review Date:</b>	October 2026	
<b>Author:</b>	Senior Health & Safety Officer	
<b>Document Owner:</b>	Senior Health & Safety Officer	
<b>Accountable Executive:</b>	Executive Director of Therapies & Health Sciences	
<b>Approved By:</b>	Health and Safety Group	
<b>Approval Date:</b>	9th October 2023	
<b>Document Type:</b>	Policy	Non-clinical
<b>Scope:</b>	PTHB wide	

The latest approved version of this document is online.  
If the review date has passed please contact the Author for advice.

## Version Control

Version	Summary of Changes/Amendments	Issue Date
1	Initial Issue	Dec 2010
2	Review of existing policy to reflect changes in legislation and guidance & new organisational name.	Dec 2012
3	Review of existing policy to reflect changes in legislation and guidance.	Oct 2016
4	<p>Review of existing policy to reflect organisational changes also changes in legislation and guidance. This review included an update of all sections, along with the inclusion of the following new sections:</p> <ul style="list-style-type: none"> <li>• Section 3 - Legal Framework</li> <li>• Section 7 - Personal &amp; Respiratory Protective Equipment</li> <li>• Section 8 - Reporting of Accidents, Incidents, and Ill Health</li> </ul>	Aug 2020
5	Policy 3-year review and update of organisational changes.	Oct 2023

<b>Item No.</b>	<b>Contents</b>	<b>Page</b>
1	Statement of Intent	6
2	Objectives	6
3	Legal Framework	6
4	Definitions	7
5	Organisational Responsibilities	8
6	Arrangements (COSHH Procedure)	13
7	Personal & Respiratory Protective Equipment	19
8	Reporting of Accidents, Incidents, and Ill Health	20
9	Monitoring Compliance, Audit & Review	20
10	References	21
<b>App. No.</b>	<b>Appendices</b>	<b>Page</b>
1	COSHH Risk Assessment Form	22

## ENGAGEMENT & CONSULTATION

### Key Individuals/Groups Involved in Developing this Document.

Role / Designation
Senior Health & Safety Officer
Infection Prevention & Control
Occupational Health
Health & Safety Group

### Circulated to the following for Consultation.

Date	Role / Designation
July 2016	Corporate Health & Safety Committee
Oct 2016	Corporate Health & Safety Committee
Sept 2020	Health & Safety Group
Oct 2020	Executive Board
Oct 2023	Health & Safety Group

### Evidence Base

**Please list any National Guidelines, Legislation or Health and Care Standards relating to this subject area?**

Fully documented within the reference section of this document

## IMPACT ASSESSMENTS

Equality Impact Assessment Summary					
	No impact	Adverse	Differential	Positive	Statement
<b>Age</b>	x				An impact assessment has been undertaken with appropriate groups. The impacts noted in the columns on the left have been identified.
<b>Disability</b>	x				
<b>Gender reassignment</b>	x				
<b>Pregnancy and Maternity</b>	x				
<b>Race</b>	x				
<b>Religion or Belief</b>	x				
<b>Sex</b>	x				
<b>Sexual Orientation</b>	x				
<b>Marriage and Civil Partnership</b>	x				
<b>Welsh Language</b>	x				
Risk Assessment Summary					
<p><b>Have you identified any risks arising from the implementation of this policy / procedure / written control document?</b></p> <p>No additional risk was identified.</p>					
<p><b>Have you identified any Information Governance issues arising from the implementation of this policy / procedure / written control document?</b></p> <p>No.</p>					
<p><b>Have you identified any training and / or resource implications as a result of implementing this?</b></p> <p>No additional resources identified over and above the departmental need to ensure staff are suitably trained in the safe use, storage and disposal of hazardous chemicals and substances.</p>					

## **1. Statement of Intent**

Powys Teaching Health Board (PTHB) is committed to ensuring the health safety and welfare of its employees, patients, visitors and all users of its facilities and services, along with any impact on the environment. By being proactive in the management of health and safety and the control of substances hazardous to health or the environment.

Powys Teaching Health Board recognises its general duties under Health and Safety at Work, etc. Act 1974 to ensure so far as is reasonably practicable, the health, safety, and welfare at work of all employees and other persons affected by its acts or omissions. Details of these duties and responsibilities are fully documented in the organisations Corporate Health and Safety Policy HSP 001.

There are many potentially hazardous substances used within the organisation, each with its benefits; however, their use or exposure to such substances can put people's health at risk, so the law requires employers to control their use and any potential exposure, to prevent ill health.

The Control of Substances Hazardous to Health Regulations 2002 (as amended) requires PTHB to protect its employees and others who may be exposed to hazardous substances, by applying eight basic steps of good management.

This policy sets out the eight basic steps and describes what needs to be done to control hazardous substances at work to ensure the organisation has robust systems for assessing the risks associated with hazardous substances and implementing suitable and sufficient control measures.

## **2. Objectives**

To ensure the use of substances hazardous to health are appropriately controlled using the eight steps of good management, so:

- the risk of injury or ill health to all PTHB employees or others that may come into contact with hazardous substances due to PTHB's undertaking are reduced as far as is reasonably practicable and any residual risks are adequately controlled.
- that PTHB and its employees meet the requirements and responsibilities outlined within the Control of Substances Hazardous to Health Regulations 2002 (as amended), Approved Code of Practice and associated Guidance.

## **3. Legal Framework**

The Health & Safety at Work etc. Act 1974 - as outlined in Section 1.

The Control of Substances Hazardous to Health Regulations 2002 (as amended) as outlined in Section 1.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) requires employers to report to the HSE instances of occupational disease, through exposure to carcinogens, mutagens, and biological agents:

Regulation 9 requires employers and self-employed workers to report cases of occupational cancer, and any disease or acute illness caused by an occupational exposure to a biological agent through a dangerous occurrence, accident or incident which results or could have resulted in the release or escape of a biological agent, likely to cause severe human infection or illness.

## 4. Definitions

Hazardous Substances – any substance which on its own or when mixed with another has by its intrinsic properties the potential to cause harm to the health of a person, these may be in solid, liquid, gas or vapour form and can include:

- chemicals;
- products containing chemicals;
- substances generated during work activities and processes, such as dust from cutting plaster;
- fumes, vapours, mists and gases;
- naturally occurring substances;
- substances with Workplace Exposure Limits (WELs);
- and kind of dust where the average concentration in the air exceeds the levels specified in COSHH;
- biological agents such as micro-organisms;
- micro-organisms that cause disease and micro-organisms used in laboratories;
- wet working e.g. in cleaning, which can cause dermatitis;
- asphyxiating gases;
- medication such as cytotoxic drugs;
- any other substance which creates a risk to health;

**Under the COSHH Regulations there are a range of substances regarded as hazardous to health, including:**

1. Substances or mixtures classified as dangerous to health under:

The European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures – the CLP Regulation.

<https://www.hse.gov.uk/chemical-classification/legal/clp-regulation.htm>

These can be identified by their warning labels. Under the European wide REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) which became law in the UK in June 2007, chemical suppliers must also provide a safety data sheet which includes important information on the chemical or substance.

<https://www.hse.gov.uk/reach/about.htm>

2. Substances with workplace exposure limits are listed in the HSE publication EH40 – Table 1.  
<https://www.hse.gov.uk/pubns/books/eh40.htm>
3. Biological agents (bacteria and other micro-organisms), if they are directly connected with the work e.g. exposure to bodily fluids, or incidental to the work (e.g. exposure to bacteria from an air conditioning or water system that is not properly maintained).
4. Any kind of dust if its average concentration in the air exceeds the levels specified in COSHH.
5. Any other substance which creates a risk to health, but which for technical reasons may not be specifically covered by CLP Regulations including asphyxiates pesticides, medicines, cosmetics, or substances produced in chemical processes.

**COSHH also covers substances that have chronic or delayed effects, for example, substances that are carcinogenic or mutagenic:**

- **Carcinogenic** - substances which cause disorders to cell growth that may lead to cancer.
- **Mutagenic** – substances which induce heritable defects or increase their incidence.

**COSHH does not apply to:**

1. Asbestos and lead, which have their own regulations.
2. Substances which are hazardous to health only because they are:
  - Radioactive
  - At high pressure
  - At extreme temperatures
  - Have explosive or flammable properties (other regulations apply to these risks)
3. Biological agents that are outside the employer's control. If in doubt, please contact the Health & Safety Team or the Occupational Health Department for advice.

## **5. Organisational Responsibilities**

### **5.1 Chief Executive**

The Chief Executive has overall responsibility and is accountable to the board of PTHB for the management of health & safety within the organisation. This includes the responsibility for the resourcing and implementation of all measures needed to comply with this policy, relevant legislation, and guidance.

<b>5.2</b>	<b>Executive Directors</b>  Executive Directors reporting to the Chief Executive and Board of PTHB, are responsible for ensuring that all risks associated with substances hazardous to health at work are adequately controlled within their areas of responsibility. Also, for ensuring where required that any health issues resulting from exposure to hazardous substances whilst at work, are investigated and reported in line with this policy.  Executive Directors are also responsible for ensuring sufficient competent resource is available, to ensure suitable and sufficient COSHH risk assessments are undertaken as required and control measures are implemented, to control the risk from substances hazardous to health. Also, to ensure sufficient resource is available for continued monitoring and supervision.
<b>5.3</b>	<b>Executive Director of Therapies &amp; Health Sciences</b>  In addition to the responsibilities outlined in 5.2, the Executive Director of Therapies & Health Sciences will take lead responsibility for the corporate management of health & safety within the organisation and is accountable for this to the Board of PTHB. These responsibilities also include ensuring that the organisation receives competent advice and guidance regarding the management and control of substances hazardous to health.
<b>5.4</b>	<b>Senior Managers</b>  For example: Assistant Directors/Business Managers/Heads of Services and those responsible for service delivery.  Senior Managers for each locality/directorate have responsibility for the day-to-day management and monitoring of health and safety within their area of responsibility.  They are directly accountable to their management for ensuring full compliance with health & safety legislation, which includes compliance with the Control of Substances Hazardous to Health Regulations 2002 (as amended). They are also responsible for ensuring adequate control measures and where required Safe Systems of Work (SSoW) are implemented and are being adhered to at all times.  Senior Managers must ensure that all employees (including Supervisors / Line Managers, agency staff, bank staff, volunteers or apprentices) attend suitable COSHH training relevant to their role and provided by the organisation. This must be completed prior to them undertaking any work with or near substances that are hazardous to health, or its supervision.  In addition, they need to ensure that systems are in place to achieve the following: <ul style="list-style-type: none"><li>• make arrangements to bring this policy, arrangements and any revisions to the notice of all employees within their area of responsibility and others who may be affected;</li></ul>

	<ul style="list-style-type: none"><li>• to identify the resources required to implement this policy and ensure that financial requirements are included in budget bids;</li><li>• ensure where appropriate, hazardous substances are substituted with safer alternatives;</li><li>• ensure all appropriate action is taken to minimise the risk from hazardous substances within their area of responsibility;</li><li>• ensure arrangements are in place for suitable and sufficient COSHH risk assessments to be undertaken, which properly assess the risk from hazardous substances;</li><li>• where necessary ensure safe systems of work are devised, documented and implemented in order to reduce risk and exposure to hazardous substances;</li><li>• ensure that Line Managers and Supervisors receive sufficient training to undertake their role;</li><li>• monitor the process of assessing COSHH risks within their areas of responsibility;</li><li>• ensuring suitable supervision is in place to ensure control measures are implemented and adhered to.</li><li>• ensure where concerns or ill health symptoms are raised, remedial action is taken.</li><li>• liaise with Occupational Health and the Senior Health and Safety Officers to determine Workplace Exposure Limits (WEL's) and whether monitoring is required;</li><li>• liaise with the Occupational Health Department, to determine if health surveillance is required;</li><li>• prepare plans and procedures to deal with accidents, incidents, and emergencies with the support of the Health and Safety Team where appropriate:</li><li>• Ensure local information, instruction and training is provided in relation to COSHH, along with suitable supervision.</li></ul>
<b>5.5</b>	<b>Line Managers/Supervisors</b>  For example: Ward Managers, Support Services Managers, Business Managers, Estates Supervisors, Support Services Supervisors & Co-ordinators, Team Leaders or Supervisors.  Are responsible for: <ul style="list-style-type: none"><li>• identifying hazardous substances present in their areas and those who may be exposed to them;</li><li>• obtaining the manufacturers safety data sheet for each product used in their areas;</li><li>• ensuring suitable and sufficient COSHH risk assessments are undertaken for each identified hazardous substance and the COSHH risk assessment form is completed or updated;</li></ul>

	<ul style="list-style-type: none"> <li>• ensure COSHH risk assessments are communicated to all employees working with, or who could be exposed to substances hazardous to health.</li> <li>• ensure that all control measures and safe systems of work resulting from the risk assessment process, are implemented and adhered to, including the identification and use of Personal Protective Equipment (PPE), or Respiratory Protective Equipment (RPE).</li> <li>• ensure all PPE and RPE has been thoroughly assessed and is fit for purpose and wearers of RPE have been face fit tested by a competent face fit tester, qualified under Fit 2 Fit accreditation.</li> <li>• ensuring, all employees receive information, instruction and training in the safe use of hazardous substances, including during local induction, which must be documented;</li> <li>• ensure any safety issues or health conditions are reported to Senior Managers, Senior Health and Safety Officers and Occupational Health;</li> <li>• ensuring employees attend health surveillance as and when requested;</li> <li>• eliminating exposure to substances hazardous to health where advised by Occupational Health or other clinical physician;</li> </ul>
<b>5.6</b>	<p><b>Employees</b></p> <p>In addition to their duties under the Health and Safety at Work etc. Act 1974, Management of Health and Safety at Work Regulations 1999 and subsequent legislation and guidance, employees will assist their managers by:</p> <ul style="list-style-type: none"> <li>• complying with the requirements of this policy, local procedures and risk assessed control measures;</li> <li>• adhering to all control measures identified during the risk assessment process, for the safe handling and use of hazardous substances;</li> <li>• only use substances that have been appropriately assessed as safe to be used in the workplace;</li> <li>• complying with any training or awareness courses for the safe handling and use of hazardous substances for the purposes of reducing the risk or exposure;</li> <li>• advising the employer on any medically related issues or conditions which may affect their work with substances used at work;</li> <li>• reporting any concerns or ill health symptoms to their line manager as soon as possible, including issues with work practices, in order that remedial actions can be taken;</li> <li>• attending the Occupational Health Department for the purposes of health surveillance, as and when directed;</li> </ul>
<b>5.7</b>	<p><b>The Estates Department</b></p> <p>In addition to the individual responsibilities of the Estates Department documented within the Corporate Health and Safety Policy the Estates Department is responsible for the following;</p>

	<ul style="list-style-type: none"><li>• ensuring any engineering controls e.g. local exhaust ventilation (LEV) are thoroughly examined and tested at least every 14 months or sooner if required by the COSHH Regulations;</li><li>• ensure a record of examinations, test or any repair carried out as the result of examinations and test on LEV systems is kept for a minimum period of 5 years from the date of the examination, test or repair.</li><li>• Ensure all contractors engaged by the Estates to carry out work have the necessary information on any hazardous substances they may encounter during the contract.</li></ul>
<b>5.8</b>	<b>Senior Health and Safety Officers</b>  The Senior Health and Safety Officers will be responsible through PTHB Health and Safety management system for: <ul style="list-style-type: none"><li>• reporting to Health and Safety Group any reported issues or incidents relating to COSHH and the action taken to prevent recurrence;</li><li>• development of PTHB Control of Substances Hazardous to Health (COSHH) Policy and advising on the local implementation procedures;</li><li>• monitoring and review of the effectiveness of PTHB Policy and locally implemented procedures through auditing;</li><li>• assisting and reviewing the process of COSHH risk assessment;</li><li>• assisting departments and managers along with the Occupational Health Department, in determining whether employees require health surveillance in line with workplace exposure limits - HSE EH40/2005 (as amended);</li><li>• communicating changes in legislation and best practice;</li><li>• reporting any instances of ill health relating to COSHH to the HSE;</li></ul>
<b>5.9</b>	<b>Occupational Health</b>  The Occupational Health Department will be responsible for: <ul style="list-style-type: none"><li>• providing a confidential service to all staff and deliver specialist advice on the effects of health on work and the effects of work on health;</li><li>• working closely with managers and providing advice, when requested on the suitability, availability and appropriateness of health surveillance in relation to COSHH and workplace exposure limits as identified in HSE EH40/2005 (as amended);</li><li>• undertaking appropriate health surveillance as identified through risk assessment and legislation;</li><li>• keeping records for the appropriate lengths of time;</li><li>• giving feedback and guidance on risk to individuals following health surveillance;</li><li>• advising the appropriate manager if there are restrictions on an individual's ability to work due to health risks;</li><li>• giving feedback on the results from health surveillance to the appropriate managers, operational safety groups and Senior Safety Officers;</li><li>• Providing quarterly and annual data (group results without giving individual</li></ul>

names) on health surveillance when requested to appropriate groups such as the PTHB Health and Safety Group;

## **6. Arrangements – COSHH Procedure**

### **6.1 Compliance**

In order to comply with the Control of Substances Hazardous to Health Regulations, the following eight steps to good management (outlined below) are to be implemented:

- assess the risk;
- decide on what precautions are needed;
- prevent or adequately control exposure;
- ensure control measures are used and maintained;
- monitor exposure;
- carry out appropriate health surveillance;
- prepare plans and procedures to deal with accidents, incidents and emergencies;
- ensure employees are properly informed, trained and supervised;

The implementation of this policy and the eight steps of good management to ensure compliance will be monitored by the local area H&S meetings and the Health and Safety Group. This will be audited by the Health and Safety Team.

### **6.2 Assess the Risk**

To effectively manage the risk from exposure to substances hazardous to health, Senior Managers must ensure Line Managers have;

1. identified all chemicals and substances that are present in the areas of responsibility;
2. obtained up to date manufacturer's safety data sheets for each product;
3. undertaken a suitable and sufficient COSHH risk assessment for each chemical or substance, using the PTHB COSHH risk assessment template (appendix 1), ensuring the following are detailed:
  - the quantities of the substance being used or produced;
  - how the substance is used or produced during work practices;
  - how they affect the user;
  - suitable control measures are identified to manage the risk. Including reviewing where applicable any existing control measures and identifying additional control measures, e.g. safe systems of work, engineering controls such as fume cupboards, or Personal/Respiratory Protective Equipment (PPE/RPE) etc.

4. ensure the findings of the COSHH risk assessment and identified control measures are communicated to all employees who are using or may be affected by chemicals or substances that are being used and this must be recorded.
5. ensure COSHH risk assessments and safety data sheets are reviewed annually or before should circumstances dictate, as detailed in section 6.3
6. ensure COSHH risk assessments and safety data sheets are available on-site and are easily accessible to those who may need to reference them.

Further information on how to carry out a COSHH risk assessment can be found via the link below:

<https://www.hse.gov.uk/toolbox/harmful/coshh.htm>

### **6.3 Decide on what precautions are needed**

The resulting COSHH risk assessments should be reviewed by the responsible Line Manager and the existing control measures should be compared against the recommended control measures.

Depending on the level of risk, any shortcomings should be notified to the Senior Manager who is responsible for devising and implementing an action plan, to ensure all appropriate control measures are in place.

It is also the Senior Manager's responsibility to check that existing control measures work and are effective.

All COSHH risk assessments and data sheets should be filed in the department COSHH risk assessment file and the information disseminated to all who work in the department and this must be recorded to verify this communication of information.

COSHH risk assessments are living documents, which the responsible Line Manager should re-viewed annually or before should circumstances dictate, including but not limited to:

- a new chemical or substance is used in the workplace that is classified as a substance hazardous to health;
- changes in the method of working or existing safe systems of work;
- the chemical or substance is used for a different task;
- the chemical or substance used is changed, i.e. manufacture or concentration;
- the HSE issue guidance in relation to the chemical, substance or work activity;
- following any adverse event involving a chemical, substance or work activity
- the results of monitoring employees' exposure show it to be necessary

## 6.4 Prevent or Adequately Control Exposure

Exposure to hazardous chemicals and substances must be prevented if it is reasonably practicable to do so. This could be achieved by:

- Changing the process or activity so that the hazardous substance is no longer required;
- Replacing the hazardous substance with a safer alternative;
- Using it in a safer form, e.g. the use of pellets instead of powder.

The HSE's website advises how to replace hazardous substances with safer alternatives through the "Seven Steps to Successful Substitution of Hazardous Substances" (link below), the responsibility for identifying safer alternatives lies with the Senior Manager. Advice and assistance with this can be obtained from the Health and Safety Team.

<https://www.hse.gov.uk/coshh/basics/substitution.htm>

If prevention of exposure is not reasonably practicable, then it must be adequately controlled. The Senior Manager should consider and put in place measures appropriate to the activity and consistent with the COSHH risk assessment, including in order of priority, one or more of the following:

- Use of appropriate work processes, systems and engineering controls, and provide suitable work equipment and materials, e.g. use processes which minimise the amount of material used or produced, or equipment which totally encloses the process;
- Control exposure at source (e.g. local exhaust ventilation), and reduce the number of employees exposed to a minimum, the level and duration of their exposure, and the quantity of hazardous substances used or produced in the workplace;
- Provide personal protective equipment (e.g. face mask, respirators, protective clothing), only as a last resort and never as a replacement for other control measures that can be applied, see section 7 - PPE & RPE;

Under the COSHH Regulations, exposure to a substance hazardous to health will be considered to be adequately controlled if:

- The eight principles of good practice set out in schedule 2A of COSHH are applied - <https://www.hse.gov.uk/coshh/detail/goodpractice.htm>
- The workplace exposure limit for the substances (if there is one) is not being exceeded;
- If the substance is known to cause cancer, heritable genetic damage or asthma, exposure is reduced to as low a level as is reasonably practicable (ALARP);

	<p>Senior Managers are responsible for applying the principals of good practice throughout their areas of responsibility to prevent or adequately control exposure to hazardous substances.</p> <p>Carcinogens (substances that cause cancer) or mutagens (substances that may cause heritable genetic damage) are listed in Schedule 1 of the Control of Substances Hazardous to Health Regulations Approved Code of Practice and Guidance L5 (Sixth Edition) 2013</p> <p><a href="https://www.hse.gov.uk/pubns/priced/l5.pdf">https://www.hse.gov.uk/pubns/priced/l5.pdf</a></p>
<b>6.5</b>	<p><b>Ensure Control Measures are Used and Maintained.</b></p> <p>COSHH requires employees to make proper use of control measures and to report issues or defects. It is the Senior Manager’s responsibility to take all reasonable steps to ensure that they do so.</p> <p>Employees should be made familiar with COSHH risk assessments for their area, any risk associated with the chemicals or substances in use and the control measures that need to be implemented, to prevent exposure and their responsibility to report issues or defects.</p> <p>Items such as local exhaust ventilation systems and safe systems of work must be regularly checked and reviewed to ensure they are still effective.</p> <p>COSHH sets specific intervals between the examination of local exhaust ventilation equipment, and it is the Senior Manager’s responsibility to liaise with the Estates Department to ensure arrangements for these inspections to take place.</p> <p>Records of examinations and tests carried out (or a summary of them) should be kept for at least five years. Advice on the frequency of examination testing of equipment can be sought from the Health and Safety or Estates Departments.</p> <p>Respiratory Protection Equipment (RPE) should be tested before use and where appropriate, thoroughly examined and tested at regular intervals, these must be recorded.</p>
<b>6.6</b>	<p><b>Monitor Exposure</b></p> <p>Under certain circumstances, the concentration of hazardous substances in the air breathed in by employees will need to be measured. The COSHH risk assessment will indicate if monitoring or exposure may be required.</p>

	<p>The responsible Senior Manager should liaise with the Health and Safety and Estates Department, to determine if any monitoring needs to be added to the annual air monitoring program.</p> <p>Any exposure monitoring will be forwarded to the responsible Senior Manager and copies kept for at least five years by the Estates Department.</p> <p>The Occupational Health Department will be informed of any monitoring results so employee health records can be updated where any monitoring is relevant to them as an individual. Employees should be informed of any monitoring results and should be allowed access to their personal monitoring records.</p>
<b>6.7</b>	<b>Health Surveillance</b> <p>The COSHH Regulations require health surveillance to be carried out under certain circumstances. The Occupational Health Department will provide advice to department managers, when requested on the availability and appropriateness of health surveillance.</p> <p>The COSHH risk assessments undertaken by departments can be used as an aid to identify areas where health surveillance may be required.</p> <p>Health surveillance might involve examination by a doctor or trained nurse, simple skin checks or a questionnaire by a trained supervisor. Under certain circumstances biological monitoring may be appropriate.</p> <p>It is the Senior Manager's responsibility to ensure any employees requiring health surveillance are referred to the Occupational Health Department.</p> <p>A record of any health surveillance carried out by PTHB's Occupational Health Department must be kept for at least 40 years.</p>
<b>6.8</b>	<b>Prepare plans and procedures to deal with accidents, incidents and emergencies.</b> <p>Plans and procedures are required where the work activity gives rise to a risk of an accident, incident or emergency involving exposure to a hazardous substance, which goes well beyond the risk associated with the day-to-day work.</p> <p>In such circumstances, the Senior Manager with the support of the Health and Safety Department/Emergency Planning Team must plan a response to an emergency involving hazardous substances before it happens.</p>

	<p>If carcinogens, mutagens, or biological agents are used, appropriate emergency plans and procedures should be in place. However, the organisation does not have to introduce these emergency procedures if:</p> <ul style="list-style-type: none"><li>• the quantities of hazardous substances to health in the workplace are such that they present only a slight risk to employees' health and;</li><li>• the control measure put in place is sufficient to control the risk;</li></ul>
<b>6.9</b>	<p><b>Information, Instruction, Training &amp; Supervision</b></p> <p>There is a legal duty placed on the Health Board under the COSHH Regulations, to provide employees with suitable and sufficient information, instruction, training and supervision.</p> <p>It is the Senior Managers responsibility to ensure this is undertaken, implemented and recorded:</p> <p>COSHH training:</p> <p>All employees who use substances that could be hazardous to health must receive appropriate COSHH awareness training, specific to their role and must be focused on the substances which members of staff come into contact with or use as part of their work. This information, instruction and training should be done locally and include:</p> <ul style="list-style-type: none"><li>• the names of the substances they are working with or could be exposed to and the significant risks to health;</li><li>• where and how to access the safety data sheets and COSHH risk assessments;</li><li>• the findings of the COSHH risk assessments, the control measures and defined methods of working;</li><li>• how and when to implement control measures;</li><li>• the Personal and Respiratory Protective Equipment required and how to use this correctly, especially RPE. i.e. the correct removal and re-fitting of gloves, and masks, including determining how long protective gloves can be worn before any liquid contamination is liable to permeate them;</li><li>• the cleaning, storage and disposal procedures they should follow, why they are required and when they need to be carried out, e.g. cleaning contaminated PPE;</li><li>• information relating to the safe storage of hazardous substances;</li><li>• procedures for dealing with any incidents and emergencies;</li><li>• if applicable, the results of any exposure monitoring and health surveillance (without giving individual employee's names);</li></ul>

Further training must be provided if there is:

- a new substance introduced;
- a change in the use or composition of a substance;
- if the substance is re-classified and safety data sheets are changed;
- new equipment is introduced that which involves the use of substances;
- observations that safe systems and procedures are not being adhered to;
- an incident investigation identifies a need;

Training should include elements of theory as well as practice. Training in the use and application of control measures and PPE should take account of recommendations and instructions supplied by the manufacturer.

Extra supervision may be required for new employees or for established and experienced staff following the introduction of new substances.

## **7. Personal & Respiratory Protective Equipment (PPE/RPE)**

Where the COSHH risk assessment has concluded that it is necessary to use personal protective equipment (PPE), this shall comply with the provisions set out in the PPE Regulations.

The main requirements of the Regulations are that PPE is to be supplied and used at work wherever there are risks to health and safety that cannot be adequately controlled in other ways.

The Regulations also require that PPE is properly assessed before use to ensure it is suitable for its intended use and:

- has the necessary CE or UKCA marking;
- suitable for the intended wearer;
- is provided with instructions on how to use it safely;
- is used correctly by employees;
- employees are trained in its use;
- is maintained and properly stored in a well-defined place;
- checked at suitable intervals, and
- when discovered to be defective, repaired or replaced before further use;

Personal protective equipment which may be contaminated by a chemical or substance that may be hazardous to health must be removed before leaving the area and suitable provision must be in place for its safe disposal.

Where it has been assessed that the use of RPE is required, RPE wearers must be face fit tested by a person who has been deemed competent through a Fit 2 Fit accredited course. This will be either Qualitative or Quantitative face fit testing. RPE wearers shall ensure the following:

- RPE is regularly inspected and maintained by a competent person;
- always follow the manufacturer's instructions;
- ensure the filters being used are adequate for the hazard;
- know how to Don the mask correctly;
- must carry out pre-use inspection and face seal check;
- ensure RPE is worn correctly all the time, every time;
- faults or concerns are reported immediately;
- ensure RPE is cleaned and stored correctly, in a clean dry place after use;
- ensure the use and maintenance of RPE is appropriately recorded.

## **8. Reporting of Accidents, Incidents and Ill Health**

Where an employee is exposed to substances hazardous to health whilst at work and suffers ill health effects, the following shall apply:

- The Line Manager must be informed immediately.
- Health and Safety Team must be informed.
- All incidents involving chemicals or substances hazardous to health must be reported on the Datix incident reporting system.
- A thorough investigation into the incident must be undertaken by the Line Manager, this may include the Health and Safety Team.
- The injured party should be referred to the Occupational Health Department, to ensure there are no lasting effects related to the incident and any exposure to the hazardous substance.

If following an Occupational Health referral, it is identified the employee is suffering from work-related ill health due to exposure to chemicals or substances hazardous to health, this will be reported to the HSE as required in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

## **9. Monitoring Compliance, Audit & Review**

Monitoring and auditing of compliance with this policy and the control of substances hazardous to health, will be undertaken as part of the Health & Safety Team Audit schedule.

As part of the audit process, managers will be required to provide the following:

- a summary report on the status of COSHH risk assessments;
- confirmation and evidence that all hazardous substances in current use cannot be replaced by less hazardous alternatives;
- confirmation and evidence that COSHH risk assessments have either been completed or reviewed in line with this policy;
- confirmation and evidence that all employees have been made aware of the findings of the COSHH risk assessments and associated risks;

- details of reviews of current Safety Data sheets for all hazardous substances in use within their area of responsibility;
- the number of identified concerns in relation to occupational exposure to hazardous substances;
- confirmation and evidence that engineering controls such as Local Exhaust Ventilation (LEV) systems are inspected and maintained to the required schedule and that records are kept for the required 5 years.
- confirmation and evidence that a suitable and sufficient process is in place for supervising and monitoring the use of chemicals or substances hazardous to health.

This document will be reviewed every three years or earlier should audit results or changes to legislation / practice within PTHB indicate otherwise.

## 10. References










- H.M. Government: Statutory Instrument (2002) Control of Substances Hazardous to Health. The Control of Substances Hazardous to Health Regulations 2002” as amended.  
Accessed via:  
<http://www.legislation.gov.uk/uksi/2002/2677/contents/made>
- H.M. Government Statutory Instrument (2009) Chemical (Hazardous Information and Packaging for Supply) Regulations 2009.  
Accessed via:  
<http://www.legislation.gov.uk/uksi/2009/716/contents/made>
- HSE (2007) Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations.  
Accessed via:  
<http://www.hse.gov.uk/reach/about.htm>
- HSE COSHH Essentials: Easy steps to Control Chemicals or Substances Hazardous to Health.  
Accessed via:  
<https://www.hse.gov.uk/coshh/essentials/>
- HSE (2009) Working with Substances Hazardous to Health - What you need to know about COSHH *INDG136(rev4)*.  
Accessed via:  
<http://www.hse.gov.uk/pubns/indg136.pdf>
- HSE (2007) EH40/2005- Occupational Exposure Limits, approved workplace exposure limits (revised & published 2020).  
Accessed via:  
<https://www.hse.gov.uk/pubns/books/eh40.htm>

# Appendix 1: COSHH Risk Assessment Form

A Word Version of this Form is available.  
via the link below

[COSHH Risk Assessment V3 June 20.docx \(sharepoint.com\)](#)

# COSHH Risk Assessment

<b>SECTION – A</b>				
<b>Department/Location:</b>				
<b>Name of Assessor:</b>	<b>Locality/ Directorate:</b>			
<b>Job Title</b>	<b>Hospital/Clinic/Surgery/Other</b>			
<b>Contact No/Ext:</b>	<b>Area in which COSHH Assessment applies, e.g. Ward/Department:</b>			
<b>Responsible Senior Manager:</b>	<b>Date of Assessment:</b>			
<b>Substance Details:</b>				
Note - Employers should regard a substance as hazardous to health if it is hazardous in the form in which it may occur in the work activity. A substance hazardous to health need not be just a chemical compound, it can also include mixtures of compounds, micro-organisms or natural materials, such as flour, stone or wood dust.				
<b>Chemical or Product</b> <input type="checkbox"/> Complete Sections - A, B & D	<b>Biological Agent/Micro-Organism</b> <input type="checkbox"/> Complete Sections - A, C & D			
<b>Is the substance:</b>				
<b>Acutely Toxic</b>  <input type="checkbox"/>	<b>Flammable</b>  <input type="checkbox"/>	<b>Oxidising</b>  <input type="checkbox"/>	<b>Corrosive</b>  <input type="checkbox"/>	<b>Damaging to the Environment</b>  <input type="checkbox"/>
<b>Serious Health Hazard</b>  <input type="checkbox"/>	<b>Health Hazard</b>  <input type="checkbox"/>	<b>Gas Under Pressure</b>  <input type="checkbox"/>	<b>Explosive</b>  <input type="checkbox"/>	

**What is the substance used for or how does it appear in the workplace? (E.g.: Cleaning, maintenance, sharps, patient care, patient care by-product, biological agent, micro-organism)**

**Section – B**

(Chemical or Product)

<b>Substance Name:</b>	<b>Supplier/Manufacturer’s Name and Address:</b>
<b>Trade Name:</b>	
<b>Product Code:</b>	<b>Supplier/Manufacturer’s Contact No: Emergency</b>

**What are the hazardous ingredients/ chemicals in the substance or the hazards associated with it? (List Below)**

Chemical Name	CAS-No. EC-No. REACH No	Classification (67/548/EEC)	Classification (REGULATION (EC) No 1272/2008)	Concentration: [%]

**Does the substance have a Workplace Exposure Limit: (give details)**

**Special hazards arising from the substance or mixture.**

**Use of Substance:**

**How is or how should the substance be used?**

**Precautions for safe handling:**

**Advice on safe handling:**

**Hygiene measures:**

**How much of the material/ substance is used or created in the workplace by one person during a working day?**

**The dilution instruction follows;**


**How long is the worker exposed to the Material/ Substance during the working day?**

<½ Hour	½ - 2 Hours	2-4 Hours	4-8 Hours	>8 Hours	All Day

**Where is the Material/ Substance used?**

Outside	Inside Well Ventilated	Inside Poorly Ventilated	Confined Space	Other Please Specify

**Attach a copy of Safety Data Sheet:**

Confirm:

**Who is or could be exposed to the substance? (e.g. those using it, patients, visitors, service users, domestics, estates, contractors etc.)**

**Does the substance present additional risks to certain groups or individuals or the environment? (E.g. young people, asthmatics, immunocompromised, expectant mothers. flora & fauna)**

**Continue to Section D - (Control Measures)**

**Section - C**

(Biological Agent/Micro-organism)

**Hazard - What Biological Agent/Micro-organism have workers/others the potential of being exposed to?**

**What are the significant risks associated with exposure to this hazard/substance?**

**Exposure method?**

Inhalation:  Ingestion:  Absorption:

**Who is or could be exposed to the substance? (e.g. those using it, patients, visitors, services users, domestics, estates, contractors etc.)**

**Does the substance present additional risks to certain groups or individuals or the environment? (E.g. young people, asthmatics, immunocompromised, expectant mothers. flora & fauna)**

**Are all workers with the potential to be exposed trained or certified to work with or handling it?**

Yes:  No:

**Are there any official guidance documents or safe systems of work available for dealing with the hazard and associated risks?**

Yes:  No:

**If yes please attach.**

**Are there any special requirements for disposal, cleaning or laundering of potentially contaminated items/equipment?**

## Section D - Control Measures

Where appropriate could a less hazardous substance be used to do the same job? (If you don't know, please contact your supplier for further information.)

Yes:  No:  N/A:

What controls are required for this substance, other than Personal Protective Equipment (PPE)? (E.g. Policies, procedures, protocols, specialised training, well-ventilated areas, not to be used in spray/mist form, local exhaust ventilation, authorised persons only, spillage kits, correct type of waste container etc.)

Is there a detailed documented procedure in place for the activities involving the substance? (E.g. cleaning procedures for mixing & using cleaning products).

Yes:  No:

If Yes please attach it to this form.

Is any Personal Protective Equipment (PPE) required when using the substance?

Eye Protection



State Type  
Required:

Gloves



State Type  
Required:

Overalls/  
Clothing



State Type  
Required:

Mask/ Respirator



State Type  
Required:

Other



State Type  
Required:

How should the substance be stored? (E.g. Locked cupboard, away from other substances, sharps bin, hazardous waste bag etc.)

Conditions for safe storage, including any incompatibilities.

Requirements for storage areas and containers:

**Have persons using/ coming into contact with this substance been provided with suitable information, instruction and training:**

Yes:

No:

**Precautions for safe handling:**

**Advice on safe handling:**

**Hygiene measures:**

**Other Precautions and Emergency Procedures**

**Spillages: How should an accidental spillage or release of this substance be dealt with?**

**First Aid: What action should be taken if the substance is:**

**(a) Swallowed?**

**(b) In contact with the eyes?**

**(c) In contact with the skin?**

**(d) Inhaled?**

**(e) Other? (Please Specify) What if;**

**Fire Precautions: (Flammable substances should also be identified within the ward/ department fire risk assessments)**

**What action should be taken in the event of fires involving this substance?**

**Chemical Reactions: If there any other substances that this substance must not come into contact with please list below:**

**Disposal: How should the substance be disposed of correctly?**

**Health Surveillance: Do staff using the substance require any health surveillance from the Occupational Health & Wellbeing Team?**

Yes:

No:

If Yes give details:

**Assessment of the Risk**

**Are all the control measures detailed above currently in place?**

Yes:

No:

If these control measures are not in place or additional controls are required state actions to be taken below. Please note COSHH substance must not be used if adequate control measures are not in place.

**Remedial Action(s) Required**

**Date for Completion**

**Are hazards to health adequately controlled with all control measures in place?**

Yes:

No:

**Current Risk Level: Using the standard risk assessment matrix below calculate the current risk level and chart below:**

Consequence

X Severity

=

**Table 3 Risk Scoring- Consequence x Likelihood (C x L)**

		Likelihood Score				
		1 Rare	2 Unlikely	3 Possible	4 Likely	5 Almost certain
Consequence Score	5 Catastrophic	5	10	15	20	25
	4 Major	4	8	12	16	20
	3 Moderate	3	6	9	12	15
	2 Minor	2	4	6	8	10
	1 Negligible	1	2	3	4	5

<b>Low Risk</b>	1-3	Action only if low cost remedy, easy to implement. Re-access if the process/ procedure, guidance or legislation change, and keep it under review.
<b>Moderate Risk</b>	4-6	Action that is cost effective in reducing the risk, planned and implemented within a reasonable timeframe.
<b>High Risk</b>	8-12	Urgent action to remove or to reduce the risk. To be escalated to senior management.
<b>Extreme Risk</b>	15-25	Immediate action to remove or to reduce the risk. Consideration given to stopping the process. Inform senior management and the Health & Safety Unit

Assessor(s) Name:	Assessor(s) Signature:	Date:
Line Manager's Name	Line Manager's Signature:	Date:
Remedial Actions Completed Date	Line Manager's Signature:	Reviewed on (Date)
Remember to attach the following: <div style="text-align: center; margin: 10px 0;"> <input type="checkbox"/> </div> Safe Systems of Work/ Task Procedure:		

**Section - D (continued)**

(Additional Information)

Empty content area for additional information.