

<b>Control of Substances Hazardous to Health (CoSHH) Policy</b>	<b>Corporate/Strategic Register No :11023</b> <b>Status: Public</b>
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Policy to be followed by (target staff)	All staff
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Related Trust Policies (to be read in conjunction with)	Risk Management Policy & Strategy for Risk Management Incident Policy Fire safety; Infection Prevention Policy Learning & Development Strategy (Training Needs Analysis) Health & Safety Policy Waste Management Policy Control of Contactors Policy

**Document Review History**

Version No	Authored/Reviewed by:	Issue Date
1.0	Leanne Wilson	24 <sup>th</sup> March 2010
2.0	Ryan Curtis - formal review	July 2014
2.1	Ryan Curtis - amendment to storage	14 June 2016
2.2	Jo Mitchell - Extended for standardisation and review process – ESR	5 December 2017
2.3	Jo Mitchell - Amendment to COSHH Inventory and added a guidance sheet	11 May 2018
2.4	Jo Mitchell - 6 month extension request due MSB standardisation	6th November 2018
2.5	Jo Mitchell - 4 month extension request due MSB standardisation	29 <sup>th</sup> May 2019

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Appendix 1 COSHH Risk Assessment Form

Appendix 2 COSHH Inventory Form

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**NOTE:** Further guidance on the control of substances hazardous to health may be found on the Health & Safety intranet page or via Senior Health& Safety Advisor on [health&safety@meht.nhs.uk](mailto:health&safety@meht.nhs.uk)

## **1.0 Purpose**

- 1.1 The purpose of the policy is to identify the responsibilities of Trust managers, employees and contracted operatives and to serve as guidance in meeting the requirements of current Control of Substances Hazardous to Health Regulations 2002 (COSHH) in order that hazards associated with substances are identified, assessed and eliminated or controlled by the most appropriate and practicable means.

## **2.0 Introduction**

Mid Essex Hospital Services NHS Trust (The Trust) has issued this policy and associated procedures as a means of achieving a safe environment in respect of the storage, use, handling and disposal of hazardous substances.

## **3.0 Scope**

- 3.1 This policy applies to all substances used, or as a by product of use, on behalf of the Trust in the delivery of its services, and covers the requirements of the following legislation:

- The Health & Safety at Work Act 1974.
- The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH)
- The Management of Health & Safety at Work Regulations 1999 (as amended).
- The Environmental Protection Act 1990.
- The Hazardous Waste (England and Wales) Regulations 2005
- The Chemicals (Hazard Information and Packaging for Supply) Regulations 2009

- 3.2 This policy and procedures do not cover the following agents as these are covered by specific legislation and separate procedural arrangements:

- Lead
- Radiation or radioactive substances
- Asbestos

## **4.0 COSHH Regulations 2002 as amended,**

- 4.1 This applies to a wide range of substances and preparations, including mixtures of two or more substances with the potential to cause harm if inhaled, ingested or where they come into contact with, or are absorbed through the skin.

- 4.2 It includes individual chemical substances or preparations such as paints, cleaning materials, metals, pesticides, medicines and insecticides. It also includes biological agents such as pathogens, or cell cultures. Substances hazardous to health can occur in many forms, such as solids, liquids, vapours, gases, dusts, fibres, fumes, mist and smoke.

- 4.3 COSHH also covers asphyxiating gases.

- 4.4 COSHH covers microorganisms that cause diseases such as leptospirosis or legionnaires disease: and those found in laboratories.

4.5 A *substance* will include any micro-organism or biological agent falling into any of the classified groups identified in the current edition of ' *The Categorisation Of Biological Agents According To Hazard And Categories Of Containment*' issued by the Advisory Committee on Dangerous Pathogens.

## 5.0 Roles and Responsibilities

Responsibility for the implementation and management of this policy will generally fall in line with the scope and range of health and safety arrangements and responsibilities outlined in the Trust's Health and Safety Policy, with specific roles as outlined below:

5.1 **The Director of Estates & Facilities Management** is the executive lead for Health and Safety and is responsible for the reporting and acting on behalf of the Board in respect of Trust wide COSHH risks within their management responsibility, this includes;

- Compliance with current legislation and codes of practice
- Supporting the Chief Executive on COSHH initiatives made on behalf of the Trust Board
- Reporting to the Chief Executive any non-compliance with the COSHH Policy in reducing workplace accidents, exposure and work related ill health and the measures necessary to eradicate the non-compliance identified.

5.2 **Senior Health and Safety Advisor** will monitor Trust COSHH data and liaise with the Procurement Manager and Pharmacy team in order to ensure that the COSHH data for Trust is maintained and will provide appropriate information to the relevant operational managers.

5.2.1 Where the Trust undertakes services within premises owned by other agencies, the Senior Health and Safety Advisor will request relevant information from the owner in relation to the existence of hazardous substances/materials that may be present and the measures employed to minimise the risk of exposure to users of the premises.

5.2.2 The Senior Health and Safety Advisor is responsible for the provision and update of information for the substance inventory and ensuring that, as required external agencies are aware of these items.

5.3 **Head of Procurement** – will ensure arrangements are in place to provide the Trust employees with up to date Material Safety Data Sheet (MSDS) through the procurement and purchasing of substances.

5.4 **Chief Pharmacist** – will ensure that up to date assessment is made of relevant medications and substances available through the pharmacy stores.

5.5 **Pathology Leads / Managers** – will ensure that up to date assessments are made of all relevant products used within laboratories and that the Health and Safety Manager is provided with a substance inventory list on an annual basis.

5.6 **Lead Nurse Infection Prevention** - Will ensure competent advice and support in relation to control of infection rising from hazardous substances are provided to employees, and will assist in investigating incidents relating to biological agents on request.

5.7 **Managers and supervisors** - are responsible for bringing the requirements of this policy to the attention of their staff and for ensuring an appropriate COSHH assessment is conducted within their areas in order to determine the level of risk and submit the department's COSHH inventory list to the Senior Health & Safety Advisor on an annual basis. Where appropriate, managers will identify members of staff to have a special responsibility for matters relating to hazardous substances.

5.7.1 Where there is a suspicion that significant risks exist, the relevant operational manager must contact the Senior Health and Safety Advisor who will assist in undertaking a risk assessment.

5.7.2 **All staff** - It is not envisaged that Trust personnel will be exposed to any significant risk of exposure to hazardous substances/materials whilst within the community or whilst undertaking visits.

5.8.1 Staff must make themselves aware of any substances they may come into contact with and report any failures in the procedure system to their line manager and using the risk event report forms.

5.7.3 Where there is a suspicion that such risks exist, the relevant operational manager must contact the Senior Health and Safety Advisor who will assist in undertaking a risk assessment.

## 6.0 Implementing COSHH

6.1 To meet the detailed requirements of the COSHH Regulations, compliance with the requirements which follow is required in respect of existing substances, before new substances are introduced, or changes to existing substances take place.

6.2 Before any new substance is introduced into the Trust, a risk assessment, (using the COSHH Assessment Form, attached as Appendix 1) must be undertaken locally and the material safety data sheet provided. Also the substance inventory list (Appendix 2) must be updated and a copy sent to the Senior Health & Safety Advisor. This is covering all aspects of the use of the substance from delivery to final disposal; the assessment will be conducted by an appropriate competent person from within the area responsible for the substance. Pictorial guidance is available under Appendix 3.

6.3 Only where the risk assessment identifies that it is 'safe' to do so may the substance be introduced into use. 'Safe' in this context means within the bounds of the information, instruction and training, equipment, including air extraction systems, general ventilation, personal protective equipment and health surveillance, that it is reasonably practicable to provide.

6.4 Where the risk assessment identifies that equipment or facilities are required in addition to those currently provided, then a substance will not be introduced into service until the requirements identified to be necessary by the COSHH assessment have been implemented and it can, therefore, be used safely.

6.5 Managers will hold a comprehensive list of every substance falling within the requirements of the COSHH Regulations for their areas. For each substance will be retained a copy of its completed COSHH assessment sheet, sa data sheet and other relevant information, including a record of the information, instruction and training. Generic COSHH Assessments (and safety data sheets) are reviewed

annually by the Senior H&S Manager and located on the H&S Pages on the Intranet for access and printing.

- 6.6 Completed COSHH assessments and accompanying material safety data sheets will be held in the department in which substances are in use, either in paper form, or staff must have access to be able to view them electronically. Clinical areas must hold copies of the COSHH Inventory in their Red Risk Book. This will ensure they are available for reference purposes including use, storage, workplace exposure limits, first aid and such other means as may be determined to be appropriate.

## **6.7 Storage & Disposal**

- 6.7.1 Managers are responsible for the disposal of hazardous waste (chemical and biological) in accordance with the requirements of environmental legislation, and Trust Waste Management Policy, holding at all times a current list of all substances awaiting disposal. Each disposal container shall clearly display the contents and quantity held therein. Disposal and its costs will be the responsibility of, and co-ordinated by the manager of the relevant Department and undertaken at periods not exceeding any specific legislation or guidance.
- 6.7.2 Only the minimum amounts of each product shall be stored within buildings and in departments at any time, large quantities of any substance must be kept in a safe, secure and clearly identified chemical store.
- 6.7.3 All COSHH items must be stored in COSHH cupboards or locked room when not in use. A limited amount of low risk items such as Tristel can be stored in a cupboard in a closed Dirty Utility/Sluice Room – at no time should COSHH items be left on display in an unattended environment.
- 6.7.4 If staff are unaware of how and where COSHH items are to be stored, they should seek advice from the Trust Senior Health & Safety Advisor.
- 6.7.5 **Medicines**
- Solid and liquid medicine dosage forms present a very low risk to staff and users of the service and will be risk assessed as a group. Many are coated and/or in blister packs which limits exposure still further
  - Medium to high risk medicines will have specific assessments. These can be found on the pharmacy shared drive under COSHH assessments. These include antibiotic reconstitution, oral chemotherapy, cytotoxics, and anaesthetic agents
  - A full inventory of medicinal agents handled by pharmacy is available on the JAC drug file
  - Any crushed, broken or spillages refer to procedures on the Pharmacy document management system - Q-pulse
  - Aseptic unit: Any chemotherapy drugs coming in are checked and any precautions are listed on the worksheet
  - Medicines information is available within normal working hours x4822

## **7.0 Procedure for the Management of Substances**

- 7.1 **Material Safety Data Sheets (MSDS)** – One of the most important requirements of the Chemical (Hazard and Information and Packaging for Supply) Regulations 2009 (CHIP), is for safety data sheets to be provided for dangerous chemicals

which are supplied for work. The safety data sheet has to contain information about the chemical to enable the recipient to take the right precautions.

- 7.1.1 The safety data sheet is not a substitute for an assessment; safety data sheets will describe the hazards of the chemicals but only the user can assess the probability of the danger arising (i.e. the risk) in the workplace.
- 7.1.2 Safety data sheets have to be provided whether the chemical is sold in bulk or in packages. They do not have to be provided when chemicals are sold for private use through shops; there is other legislation which requires suppliers to provide information in these cases.
- 7.1.3 Safety data sheets contain Risk Phrases and Safety Phrases which are standard phrases set out in CHIP. Risk phrases describe the dangers of the chemicals in more detail, e.g. "Toxic by inhalation". Safety phrases tell the user what to do, or not to do, with the chemical, e.g. "Keep away from children" or "Do not empty into drains".
- 7.2 All Department managers are required to send an updated **Substance Inventory list** to the Senior Health & Safety Advisor (See Appendix 2) on an annual basis.
- 7.3 All substances on the departments inventory list must have a MSDS and have a **COSHH Risk Assessment** completed which will both be held within the department for all staff to view. An electronic copy of the assessment and inventory list will be held on the Trust healthcare share drive with the MSDS.
- 7.4 **Maintenance of control systems** - where there are engineering control systems in place as a means of minimising the risk of exposure to substances, managers and supervisors will ensure that the Estates Department are aware of the nature of the engineering controls in use within the department. Estates will ensure that all servicing and mandatory inspections are undertaken within the required timeframe. For example Local Exhaust Ventilation (LEV's) must have a periodic thorough examination and test (at least every 14 months) and keep a copy of this for at least 5 years.
- 7.5 **Health Surveillance** – where the nature of the substance being used requires that health surveillance is necessary, managers and supervisors will be responsible for ensuring that the Occupational Health Department is notified **prior** to the use of such substances. Health surveillance will be treated as being appropriate where:
  - 7.5.1 Guidance on the nature of substances likely to require health surveillance is available from the Occupational Health Department and managers and supervisors must seek advice where the risk assessment or Material Safety Data Sheet (MSDS) indicates there is the potential for any adverse health effects.

## 8.0 Training

- 8.1 Training will be delivered to staff in accordance with the Trust Training Needs Analysis (Mandatory Training Policy) to enable staff to recognise the risks associated with hazardous substances and to undertake appropriate risk assessments.

- 8.2 All employees receive staff awareness training on the risks associated with the management of hazardous substances which is delivered at Induction and Refresher mandatory training sessions.
- 8.3 Further training is delivered dependant on staff roles in accordance with the training needs analysis.
- 8.4 Contractors and temporary workers will receive COSHH training as part of their site induction, in accordance with the Control of Contractors Policy.

## **9.0 Review**

- 9.1 This policy will be reviewed every three years or when necessary in the light of legislative requirements or current knowledge and experience gained by the Trust.

## **10.0 Audit and Monitoring**

- 10.1 The Trust's operational arrangements for the control of substances are audited as part of the health and safety inspections that are undertaken on a rolling basis. The Senior Health & Safety Advisor will conduct these inspections in conjunction with department managers and other competent persons. This will include inspections of the COSHH assessments and ensuring that procedures are being followed and facilities/equipment are in place.
- 10.2 The Health and Safety Group shall keep under review compliance with the Regulations and this Policy, receiving monitoring reports to each meeting on compliance with risk assessment.
- 10.3 In accordance with government directives, the Trust training needs analysis will be reviewed regularly in relation to COSHH training and the staff who should receive it. Line managers are responsible for checking that staff attend training in line with the training needs analysis.

## **11.0 Communication and Implementation**

- 11.1 The policy will be made available on the Trust's intranet & website. The Senior Health & Safety Advisor will be responsible for issuing copies to all senior managers, general managers and ward sisters for dissemination within their departments.
- 11.2 The approved policy will be notified in the Trust's Staff Focus that is sent via e-mail to all staff.

## **12.0 References**

- The Health and Safety at Work Act (etc) 1974
- Management of Health and Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health 2002 (as amended)
- Reporting of Injuries Diseases and Dangerous Occurrence Regulations 2013
- EH40/2005 Workplace Exposure Limits

- The Control of Substances Hazardous to Health Regulations 2002 (as amended). Approved code of practice and guidance. (L5)
- HSG97 A step by step guide to a COSHH Risk Assessment
- INDG 136 Working with Substances Hazardous to Health – what do you need to know about COSHH

COSHH Risk Assessment Record Form

<b>Overall Assessment Rating:</b>		<b>Low</b> <input type="checkbox"/>		<b>Medium</b> <input type="checkbox"/>		<b>High</b> <input type="checkbox"/>		
<b>Dept:</b>	<b>Site:</b>		<b>Assessment Ref No:</b>					
<b>Substance/Trade Name:</b>								
<b>Material Safety Data Sheet attached</b>		Yes <input type="checkbox"/>			No <input type="checkbox"/>			
<b>Substance description (tick relevant boxes)</b>								
<b>Solid</b> <input type="checkbox"/>	<b>Liquid</b> <input type="checkbox"/>	<b>Gas</b> <input type="checkbox"/>	<b>Dust</b> <input type="checkbox"/>	<b>Powder</b> <input type="checkbox"/>	<b>Micro-organism</b> <input type="checkbox"/>	<b>Other (state)</b> <input type="checkbox"/>		
<i>Other information</i>								
<b>Principle Hazards and Warning Signs (tick relevant Box)</b>								
 Flammable gases, aerosols, liquids and solids. <input type="checkbox"/>	 Or  Corrosive to metals, Skin corrosion/irritation. Serious eye damage/eye irritation. <input type="checkbox"/>	 Or  Acute toxicity (oral, dermal, inhalation) <input type="checkbox"/>	 Skin sensitiser <input type="checkbox"/>	 Or  Respiratory sensitiser. Germ cell mutagenicity. Carcinogenic. Reproductive toxicity. Specific target organ toxicity-repeated exposure. Aspiration hazard. <input type="checkbox"/>	 Oxidising gases, liquids and solids <input type="checkbox"/>	 Hazardous to the aquatic environment <input type="checkbox"/>	 Explosive <input type="checkbox"/>	 Gas under pressure <input type="checkbox"/>
<b>Route(s) of Exposure</b>	<b>Ingestion</b> <input type="checkbox"/>	<b>Skin Contact</b> <input type="checkbox"/>	<b>Eye Contact</b> <input type="checkbox"/>	<b>Injection</b> <input type="checkbox"/>	<b>Inhalation</b> <input type="checkbox"/>			
<b>Harmful Effects:</b>								
<b>Workplace Exposure Limits (WEL):</b> (Refer to Material Safety Data Sheet)	N/A <input type="checkbox"/>	<b>Short term (15 mins):</b>		<b>Long term (8 hours):</b>				
<b>How much is used?</b> (Tick as appropriate)	20 litre/Kg <input type="checkbox"/>	10 litre/Kg <input type="checkbox"/>	5 litre/Kg <input type="checkbox"/>	> litre/Kg <input type="checkbox"/>	< litre/Kg <input type="checkbox"/>	Other (State): <input type="checkbox"/>		
<b>Who is exposed to the substance?</b>				<b>YES</b>	<b>NO</b>			
Staff				<input type="checkbox"/>	<input type="checkbox"/>			
Patients				<input type="checkbox"/>	<input type="checkbox"/>			
Public				<input type="checkbox"/>	<input type="checkbox"/>			
Contractors				<input type="checkbox"/>	<input type="checkbox"/>			
Departmental Staff				<input type="checkbox"/>	<input type="checkbox"/>			
Additional risks to certain groups or individuals? (E.g. young people, expectant mothers)				<input type="checkbox"/>	<input type="checkbox"/>			

## CONTROL MEASURES

1	Is an alternative substance already used?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	DETAILS	
2	Is exposure reduced by:				
	a) Totally enclosing process	<input type="checkbox"/>	<input type="checkbox"/>		
	b) Local extract ventilation (LEV)	<input type="checkbox"/>	<input type="checkbox"/>		
	c) General ventilation	<input type="checkbox"/>	<input type="checkbox"/>		
	d) Introduction / change to safe system	<input type="checkbox"/>	<input type="checkbox"/>		
	e) Rotation of staff	<input type="checkbox"/>	<input type="checkbox"/>		
	f) Use of personal protective equipment (PPE)	<input type="checkbox"/>	<input type="checkbox"/>		
3	(If yes from question 2b) Is installed LEV serviced and test date:				
4	Personal Protective Equipment required ( <i>tick relevant boxes</i> )				
	 Hard Hat <input type="checkbox"/>	 Face Protection <input type="checkbox"/>	 Eye Protection <input type="checkbox"/>	 Dust Mask <input type="checkbox"/>	 Respirator <input type="checkbox"/>
	 Ear Protection <input type="checkbox"/>	 Laboratory Coat <input type="checkbox"/>	 Apron <input type="checkbox"/>	 Foot Protection <input type="checkbox"/>	 Gloves <input type="checkbox"/>
	Make & model of PPE equipment used:				
	Does the PPE bear the CE mark:			YES <input type="checkbox"/>	NO <input type="checkbox"/>

## EMERGENCY MEASURES

5	First aid measures	DETAILS		
	Eyes			
	Inhalation			
	Skin			
	Ingestion			
6	Is a spillage procedure required?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	
7	Are special disposal procedures required?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	
8	Are special fire fighting measures required?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	
9	Is air monitoring required? (Attach Results of air monitoring)	YES <input type="checkbox"/>	NO <input type="checkbox"/>	

<b>10</b>	Is Health Surveillance required	YES <input type="checkbox"/>	NO <input type="checkbox"/>			
<b>11</b>	Can effects of exposure be reduced by immunisation?	YES <input type="checkbox"/>	NO <input type="checkbox"/>			
<b>12</b>	Storage Arrangements	YES <input type="checkbox"/>	NO <input type="checkbox"/>			
<b>13</b>	Persons at Risk	Informed of risk?		Trained in use of controls?		DETAILS
		YES	NO	YES	NO	
Department staff		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other staff <i>(e.g. cleaners, maintenance)</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Contractors		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Patients		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
General public		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Any comments not already documented on the assessment?						

Date of Assessment:	
Next review due:	
Reviewed by:	
Job title:	
Signature:	



## Specific/Other COSHH Items

Include other COSHH items that may be used in the ward/department below.

Product	Supplier	COSHH Assessment Reference No.	COSHH Assessment Date

**Periodic Audits to check assessments are updated and in Red Risk Book will be undertaken by the Health & Safety Team**

**COSHH Hazard Pictograms**

Hazard pictograms alert us to the presence of a hazardous chemical; in the course of your duties at the Trust you may see these on packaging of the substances in use. The pictograms help us to know that the chemicals we are using might cause harm to people or the environment. One or more pictograms might appear on the labelling of a single chemical.



Explosive (Symbol: exploding bomb)



Flammable (Symbol: flame)



Respiratory Serious health hazard (Symbol: health)



Oxidising (Symbol: flame over circle)



Corrosive (Symbol: Corrosion)



Gas under pressure (Symbol: Gas cylinder)



Acute toxicity (Symbol: Skull and crossbones)



Hazardous to the environment (Symbol: Dead tree and fish)



Health hazard, harmful