Control of Substances Hazardous to Health

For use in: All areas of the Trust including the Community
For use by: All members of staff
For use for: To ensure all members of staff and others (patients, visitors and contractors) are protected from the risks relating to hazardous substances at work

Document owner: Health, Safety and Risk Manager
Status: Being reviewed

Policy Statement:
The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended) requires the West Suffolk NHS Foundation Trust (WSFT) to make an assessment of the risks to health, which arises from exposure to hazardous substances in the work place. As part of this assessment the WSFT must establish what measures are necessary (so far as is reasonably practicable) to prevent or adequately control exposure to substances hazardous to health. Also what further precautions and emergency procedures need to be taken to protect the health of its employees. The WSFT recognises that they must safeguard all employees but also so far as is reasonably practicable anyone who is not in the WSFT’s employment, who may be affected by their activities e.g. patients, visitors and contractors (others).

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1. Introduction
This document has been prepared to provide information and guidance on compliance with the Health and Safety at Work etc. Act 1974 and the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended).

These Regulations apply to all work in which employees and others are or could be exposed, or are likely to be exposed to substances hazardous to health. Employees and others can encounter a wide range of substances capable of damaging their health within the working environment.

The COSHH Regulations expand on the duties contained within the Health and Safety at Work Act and lay down the essential requirements. The HSE have developed a simple eight step approach (see below) for the control of hazardous substances including biological agents and for protecting people exposed to them. Failure to comply with COSHH Regulations, in addition to exposing employees or others to risk, constitutes an offence and is subject to penalties under the Health and Safety at Work etc. Act 1974.

The WSFT shall ensure that the exposure of employees and others to substances hazardous to health is either prevented or where this is not reasonably practicable, adequately controlled. This is done by following the eight steps below:

1) **Assess the risks**- Identify all hazardous substances used or created in the workplace and assess the risks to health.
2) **Decide what precautions are needed** - No work which could expose the WSFT's employees to hazardous substances shall be carried out until the risks and necessary precautions have been considered and anything else the WSFT needs to do to comply with COSHH.
3) **Prevent or adequately control exposure** - The WSFT must prevent its employees from being exposed to hazardous substances. Where preventing exposure is not reasonably practicable, then it must be adequately controlled.
4) **Ensure that control measures are used and maintained** - The WSFT must ensure that control measures are used, maintained properly, records kept and that safety procedures are followed.
5) **Monitor the exposure** - Monitor the exposure of employees to hazardous substances by undertaking suitable background air monitoring if necessary. Records must be kept for 5 years of any exposure monitoring.
6) **Carry out appropriate health surveillance** - The WSFT must ensure that appropriate health surveillance is undertaken when the assessment has shown a need for it, an employee has or may have been exposed to a hazardous chemical or where COSHH sets specific requirements. Health records must be kept for 40 years.
7) **Prepare plans and procedures to deal with accidents, incidents and emergencies** - The WSFT must ensure that appropriate plans and procedures are in place to deal with accidents, incidents and emergencies involving hazardous substances.
8) **Ensure employees are properly informed, trained and supervised** - The WSFT must ensure that all employees have been given suitable and sufficient information, instruction and training in relation to hazardous substances they will be using or could be exposed to, the safe use of control measures including PPE and have access to COSHH assessments and safety data sheets.

2. Aim of the Policy
The aim of the policy is to:

a) Ensure that the WSFT complies with the Control of Substances Hazardous to Health Regulations 2002.
b) Ensure COSHH risk assessments have been completed for all hazardous substances and appropriate control measures have been put in place to prevent or control exposure.
c) Minimise the risk of staff being exposed to hazardous substances in the workplace, by having appropriate control measures in place.
d) Establish precautions and control measures needed which are appropriate to the risk. Wherever possible, the risk should be eliminated.

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

f) Monitor the extent to which employees are exposed to hazardous substances and carry out health surveillance where necessary. Health records will be kept for a minimum of 40 years

g) Inform, instruct and train employees regarding the hazards, risks and precautions needed to comply with COSHH.

3. Hazardous Substances

To be subject to the COSHH Regulations, a hazardous substance must arise out of or be used in connection with work activities.

The COSHH regulations applies to a wide range of substances, preparations and biological agents, which have the potential to cause harm if they are inhaled, ingested, injected or absorbed through the skin.

These can include individual chemicals such as, paints, cleaning materials and pesticides, also:

- Any substance classified under the Classification, Labelling and Packaging of substances and mixtures Regulation (the CLP 2015 Regulations) classified as: Very Toxic, Toxic, Harmful, Corrosive, Irritant, Sensitising, Harmful to the Environment, Explosive, Gas under Pressure, Flammable, Oxidising, Carcinogenic and Mutagenic.

- Any chemical with an assigned Workplace Exposure Limit (WEL) as defined in EH40 - a WEL is the accepted concentration of any hazardous substance in the workplace, this level is shown on the Safety Data Sheet (SDS) and represents an exposure level which must not be exceeded.

- Any Biological Agent used at work.

- Any dust in substantial quantities in the air.

Also any substance not fulfilling any of the categories above but capable by its properties of creating a risk to health.

There are exceptions not covered within the COSHH Regulations, these include exposure to lead which are covered by the Control of Lead at Work Regulations 2002 and Asbestos, covered by the Control of Asbestos Regulations 2012. Other exceptions include hazards posed by exposure to radiation, substances that are hazardous by virtue of explosive or flammable properties because they are at high or low temperature or under high pressure. These all have their own specific set of regulations.

Where the substance poses a risk to the health of a person to whom the substance is administered in the course of medical treatment by a registered medical practitioner, registered dentist or appropriate practitioner this will be covered under Section 58 of the Medicines Act 1968.

4. Safety Data Sheets (SDS)

Under the Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations 2007 (REACH) suppliers must provide safety data sheets for hazardous chemicals used in the workplace. This is a detailed information sheet and is made up of the following 16 sections:

1. Identification of the substance/mixture and of the company/undertaking

2. Hazards identification

3. Composition/information on ingredients

4. First-aid measures

5. Fire-fighting measures

6. Accidental release measures

7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information

The safety data sheet contains relevant information from chemical suppliers to their customers so that workers and the environment can be properly protected. Safety data sheets are not confidential and the WSFT should be provided with copies on request. If a safety data sheet isn't provided with the chemical, then the supplier can be contacted to provide a copy either electronically or as a hard copy. Safety data sheets provide more technical and detailed information about the chemical, more information about how to use it safely and how to deal with emergencies.

A safety data sheet is not a COSHH risk assessment; however the information contained within the safety data sheet can be used to help complete a COSHH risk assessment.

5. Roles and responsibilities

a) Chief Executive
The Chief Executive has overall responsibility for ensuring compliance to the COSHH Regulations throughout the WSFT including Community Services.

b) The Executive Lead for Health and Safety
The Executive Chief Nurse is the nominated Executive lead for Health and Safety. The Executive lead for Health and Safety will assist in ensuring high standards of health and safety including COSHH are achieved across the WSFT. They are also responsible for monitoring health and safety performance and promoting health and safety at an Executive level.

c) Executive Directors are to:
Ensure that Clinical Directors and Associate Directors of Operations are made aware of this policy and support in implementing and enforcing the policy within their areas of responsibility.

d) Associate Directors of Operations, Senior Operations Managers, Lead Clinicians, Service Managers, Heads of Nursing and Matrons are to ensure:
- That all staff are made aware of the requirements of the COSHH Policy and comply with the safe systems contained within it.
- That all staff receives the appropriate information, instruction, training and supervision to enable them to utilise the appropriate safe systems for the Control of Substances Hazardous to health.
- A COSHH Link Person has been identified, appropriately trained and in place within each department who uses hazardous substances.

e) Ward Managers and Heads of Departments:
Each Manager or Head of Department has been delegated responsibility for "local" implementation of the requirements set out in this policy and procedure and by the COSHH Regulations. To assist the Manager or Head of Department with their responsibility they will nominate a COSHH Link Person(s) to assist with compliance to this policy and procedure and ultimately the COSHH Regulations (note: a Manager or Head of Department will always retain ultimate responsibility within their department for ensuring good standards of health and safety including COSHH). The Manager or Head of Department must notify the Health, Safety and Risk Manager or Risk Officer who the COSHH link person is and if they leave, who their replacement is.
It will be the responsibility of the individual Manager or Head of Department to ensure that COSHH assessments are undertaken on all substances which are hazardous to health. They will utilise their own departmental COSHH link person(s) and request assistance from the Health, Safety and Risk Manager, Risk Officer and from other experts for advice where required e.g. Occupational Health Advisors.

It will, also be the responsibility of the Manager or Head of Department to ensure that manufacturers, and other guidance on the use of substances hazardous to health is followed and that appropriate protective clothing and equipment (PPE) is provided free of charge to staff when appropriate. It is essential that Managers or Heads of Department ensure staff use and wear the provided equipment and PPE and they have been trained in its use.

The Manager or Head of Department will ensure the COSHH Link Person(s) attend appropriate training to fulfil the role and they will support the COSHH link person by providing enough time to undertake the duties of the role.

Managers or Heads of Departments are responsible for ensuring that a COSHH folder is kept in a suitable location for all staff to access and must include:

- an up to date inventory of all substances used in the department
- appropriate safety data sheets for each substance
- Up to date COSHH assessment of each substance
- COSHH policy (PP39)
- Sharps injury (safe handling and disposal of sharps) policy PP16
- Occupational Health and Wellbeing service policy PP046
- Hand Hygiene policy PP225

The Manager or Head of Department is responsible for advising the Occupational Health and Wellbeing Service of those members of staff identified at risk of exposure to a hazardous substance or if a member of staff has or thinks they have been exposed to a hazardous substance to enable a health surveillance programme to be initiated.

f) COSHH Link Person(s)

Each area or department of the WSFT including the Community Services will require a COSHH Link Person(s). The position of the COSHH link person is open to volunteers as well as those nominated by the Manager or Head of Department, numbers for each department will be at the discretion of the Manager or Head of Department. COSHH Link Person(s) are a vital link between all areas of the hospital as communication of COSHH issues is key to ensuring a uniform and positive approach is taken.

The role is supported by the Health, Safety and Risk Manager and Risk Officer with an initial training session on current legislation and the WSFT’s policy and procedure for managing COSHH. The Health, Safety and Risk Manager encourages this training to be refreshed every 2 years or as and when policies and procedures change. All COSHH training will be advertised and participation can be booked by contacting the Risk Officer on ex: 3909

Functions of the COSHH Link Person include:

- Encouraging co-operation between Managers and employees in developing and implementing control measures to ensure the health and safety of all employees and others (persons not in the WSFT’s employment)
- Identifying all substances hazardous to health which are used within the area and ensure that these are appropriately COSHH risk assessed.
- Ensuring that COSHH assessments are reviewed, kept up to date and if reasonably practicable at the point of use for the relevant hazardous substance.
- Ensuring that substances hazardous to health are not left unattended, decanted into unlabelled or unsuitable containers and they are stored appropriately as per the risk assessment requirements
- Ensuring that the appropriate control measures and Personal Protective Equipment (PPE) are available and used by staff.
• Bringing to the attention of Managers, any unsafe acts or conditions that pose a risk within the working environment or working practices. It is important that the COSHH Link Person takes up matters with Managers without delay.
• Establishing close working relationships with other COSHH Link Persons to examine hazardous situations of a similar nature to develop a common approach and to act in a uniform, responsible manner.
• May if required represent their department via consultation with the enforcing authorities.
• To assist where appropriate with the introduction of Sypol (the WSFT’s COSHH Management System) into their areas, with information and training provided by the Risk Officer.

Each COSHH Link Person will maintain a folder to be retained within the Department or work area appropriately sub-divided to contain the following:-
  • an up to date inventory of all substances used in the department
  • appropriate safety data sheets for each substance
  • Up to date COSHH assessment of each substance
  • COSHH policy (PP39)
  • Sharps injury (safe handling and disposal of sharps) policy PP16
  • Occupational Health and Wellbeing service policy PP046
  • Hand Hygiene policy PP225

NB The folder must be a working policy folder and available for all members of staff and for any external check e.g. the Health and Safety Executive (HSE) and CQC

g) The Health and Safety Committee
The Health and Safety Committee is responsible for monitoring the health and safety arrangements within the WSFT and Community Services this includes compliance to the COSHH Regulations and reports directly to the Corporate Risk Committee. The Health and Safety Committee will receive information from Occupational Health Advisors should there be any risk identified from any surveillances, to identify and monitor any trends and make appropriate recommendations to the WSFT.

h) Specialist Groups
Specialist groups may be set up by the Health and Safety Committee when needs arise to focus on specific COSHH issues e.g. anaesthetic gases, microbiological substances to investigate and report on their findings.

i) The Risk Office
The Risk Office will act as a source of advice and guidance for all employees including Managers or Heads of Departments and COSHH link persons on the implementation of the requirements associated with the COSHH Regulations. Please contact the Heath, Safety and Risk Manager on ext. 3944 or the Risk Officer on ext. 3909 for further advice and details of COSHH training. COSHH training is booked directly through the Risk Officer.

j) Occupational Health and Wellbeing Service
The Occupational Health and Wellbeing Service will carry out health surveillance on those employees identified at risk from being exposed or have or may have been exposed to a hazardous substance, this surveillance can and will only take place once the Manager or Head of Department has requested it.

A report based on the results from any health surveillance contains basic personal details and a conclusion relating only to the fitness of the member of staff, will be issued to the appropriate Manager or Head of Department. A further copy will be held with the Occupational Health and Wellbeing Service to assist with further health surveillance with the original and further results placed on the employee’s personal file.

It will be down to the Occupational Health advisors to inform Managers or heads of Department if there has been an identified risk that requires actions and possible further surveillances of other employees.
The Occupational Health and Wellbeing Service will maintain health surveillance records on behalf of the Trust for a minimum of 40 years.

k) All Employees
All WSFT employees have responsibilities under the COSHH Regulations for the following:-

- To co-operate with the WSFT so that it can meet its obligations under the regulations, e.g. following established procedures which minimise the risk of exposure.
- Take part in training programmes.
- Read and familiarise themselves with container labels, COSHH assessments and safety data sheets as these will advise about health risks, other hazards, precautions to take including PPE / storage and any other action required.
- Use control measures correctly - always use these in the intended manner for materials, plants and processes.
- Follow the defined methods of work.
- Wear PPE provided, including any RPE (Respiratory Protective Equipment), correctly and in accordance with the manufacturer’s instructions.
- Store the PPE, when not in use, in the accommodation provided.
- Remove any PPE, which could cause contamination before eating, drinking or smoking.
- Maintain a high standard of personal hygiene and make proper use of the facilities provided for washing, showering, eating and drinking.
- Report promptly to the Manager or Head of Department any defects discovered in any control measure, including defined methods of work, device, facility, PPE or RPE.
- Store equipment, chemicals and tools correctly in the designated area - don’t leave them where they can create a hazard or be damaged.
- Take part in health surveillance and keep all appointments when required.
- Report any accidents or incidents which have or may have resulted in the release into the workplace of a substance hazardous to health as soon as possible to a Manager or Head of Department and via the WSFT’s incident reporting system (Datix).
- Use and store chemicals in line with training, manufacturer’s instructions, COSHH assessment and Safety Data Sheets.
- Do not decant chemicals into unlabelled containers
- Do not leave chemicals unattended when not in use.
- To check the use by dates of any chemical being used and dispose of as per safety data sheet. Any alcohol hand gels removed that are out of date must be disposed of via Pharmacy.

k) Contractors/Agencies
Contractors and agencies providing their services at the WSFT will ensure that they work to all WSFT’s requirements and will provide Safety Data Sheets and COSHH assessments of any substances hazardous to health which they may bring on site. Likewise any employee contracted or provided by an agency will be made aware of the COSHH assessments and control measures appropriate to their work by the relevant Manager or Head of Department during their local induction.

6. Training
Training and guidance will be provided by the Health, Safety and Risk Manager or the Risk Officer. To gain information on training or for any COSHH issues please contact the Health, Safety and Risk Manager on ext. 3944 or the Risk Officer on ext. 3909. Managers and Heads of Departments will be responsible for ensuring that they and their employees are adequately trained on the use of hazardous substances, any training records must be kept in personal files and on OLM. COSHH link persons will be required to attend the appropriate training to fulfil their role and to attend refresher training every 2 years.

7. Risk Assessment of Substances Hazardous to Health (COSHH Assessment)
a) The Assessment
The purpose of the COSHH assessment is to enable Managers or Heads of Departments to make a valid decision about the measures necessary to prevent or adequately control the exposure of their employees and others to substances hazardous to health arising from their work.

The COSHH assessment must be a systematic review and the following questions will assist in carrying out such an assessment:

- What substances are present?
- In what form?
- What harmful effects are possible?
- Where are and how are, the substances actually used or handled?
- What harmful substances are given off, fumes, etc.?
- Who could be affected, to what extent, and for how long?
- Under what circumstances?
- How likely is it that exposure will happen?
- What precautions need to be taken to comply with the COSHH Regulations?

All these factors must be compared against what happens in your workplace in practice. In gathering information for the COSHH assessment, which is completed on Sypol (WSFT’s COSHH Management System) expert advice may need to be obtained. The Health and Safety Executive (HSE) guidance is available online and manufacturers provide information on their products by means of safety data sheets and appropriate labelling. The Health, Safety and Risk Manager and Risk Officer can also be contacted on ext. 3944 or 3909 to provide assistance and guidance. Occupational Health and Wellbeing Service, Trade Unions and employer associations are also useful sources of information and guidance.

b) New Substances
Routinely
The implementation of COSHH Regulations is not a “one off” exercise. It is a continuous process. It is illegal to introduce a new substance to any Department or Ward without a COSHH assessment being undertaken before it is put into use; staff must be trained on using, handling and storing the chemical and made aware of the risks associated with the new chemical and a copy of the safety data sheet made available.

8. Hierarchy of Control / Principles of good practice
It is essential to ensure that exposure of WSFT employees and others to hazardous substances is prevented or, if not reasonably practicable, adequately controlled. On the basis of the assessments carried out, it will be necessary to decide which control measures are appropriate to the work situation in order to deal effectively with any hazardous substances that may be present. This may mean preventing exposure by following the hierarchy of control and the eight principles of good practice:

Hierarchy of control
- Eliminate - can you completely remove the need for the Substance?
- Substitute - the hazardous for the less hazardous
- Introduce an Engineering Control - LEV (Local Exhaust Ventilation) or total enclosure.
- Change work methods/patterns - brush instead of spray, reduce exposure and staff rotation
- Safe System of Work - Written methods for carrying out the task, staff adequately trained on its use
- Personal Protective Equipment (PPE)-Used as a last resort

Principles of good practice
1. Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health.
2. Take into account all relevant routes of exposure-inhalation, injection (needle stick injuries), skin absorption and ingestion- when developing control measures.
3. Control exposure by measures that are proportionate to the health risk.
4. Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health.
5. Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment.

6. Check and review regularly all elements of control measures for their continuing effectiveness.

7. Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks.

8. Ensure that the introduction of control measures does not increase the overall risk to health and safety.

9. Procurement
Where there is a proposal to purchase or change a substance, the person responsible for requesting and using the substances which may be hazardous to health, will ensure the hierarchy of control is applied. It is the responsibility of the Manager, Head of Department or COSHH Link Person to ensure a copy of the safety data sheet is made available and to complete a COSHH assessment on Sypol before ordering the new chemical. A COSHH request form (Appendix III) must then be completed and sent to the Purchasing Department before ordering the new substance.

10. Personal Protective Equipment (PPE)
The use of personal protective equipment (e.g. goggles, dust masks, respirators and protective clothing) as the means of protection will only be considered as a last resort where other measures cannot adequately control exposure as per the hierarchy of control.

All personal protective equipment shall be:
- Stored in a suitable well defined place and where required changing areas will be provided to ensure there is no cross contamination from work to personal clothing.
- Checked and cleaned at suitable intervals
- When discovered to be defective, repaired or replaced before further use.

Personal protective equipment including clothing which may be contaminated by biological agents shall be:
- Removed in a suitable changing / decontamination area having left the work area.
- Controlled appropriately ensuring it is kept apart from uncontaminated clothing and equipment.

11. Storage
All substances hazardous to health must be stored safely and securely in line with information pertinent to that substance. Storage requirements for individual substances are clearly indicated on the safety data sheet based on their quantities, properties and compatibility with other substances.

All hazardous substances will be stored in a suitable, sufficient and lockable storage container appropriate for the chemicals to be used. Only trained staff will be allowed access to stored chemicals.

The storage container must have appropriate signage, be well ventilated and have flooring which is impervious, resistant to liquids and easy to clean (spills etc.). Appropriate separate safe storage bins or cabinets must be provided for flammable and combustible chemicals. It is recommended that no more than 50 litres of extremely, highly flammable and those flammable liquids with a flashpoint below maximum ambient temperature of the workroom/working area and no more than 250 litres for other flammable liquids being stored indoors, if required use the flammable liquid store located near the goods in ramp.

So far as is reasonably practicable, hazardous substances should be stored in the original sealed container with the relevant safety data sheet and COSHH assessment displayed.

Where hazardous substances are decanted and stored in a different container then this container must be suitable for containing the substance and clearly labelled with the substance name and appropriate hazard warning labels.
If hazardous substances are not in regular use, but a decision has been made to retain them for probable future use, they must be stored in an appropriate storage container with adequate information (safety data sheet and COSHH assessment) and a relevant spill kit should be available.

12. Accidents/Incidents involving Substances Hazardous to Health

Employees and or others may be inadvertently exposed to hazardous substances through spillages or leakage. The presence and removal of a chemical spill can present a variety of hazards and therefore all departments within the Trust must ensure they have a COSHH folder which contains a copy of the safety data sheet and COSHH assessment for each chemical they use.

Where the COSHH assessment shows a substance to be high risk, the Department Manager or Head of Department will develop a local spillage procedure for ensuring safe containment of the substance and subsequent disposal. Where more than one high risk substance is used, a separate local spillage procedure will be required for each, relevant to the individual hazards presented. A copy of the local spillage procedure must be kept in the area where the chemical is used and copies kept in the COSHH folder.

Managers must ensure that appropriate measures are in place to adequately contain and clear spillages, and make the environment safe whilst doing so. Managers must ensure that adequate and appropriate spill kits are available, staff have been trained in their use and the contents are checked on a regular basis. PPE is usually required to control the exposure of those working in the area of contamination. All other persons should be excluded from the area.

The Manager, Head of Department and COSHH Link Person must ensure that all staff are given adequate information, instruction and training on how to deal with or what to do in an emergency situation.

If the spillage is too severe to handle within the department evacuate the area in accordance with the COSHH assessment and the department's local emergency plan. Raise the alarm via 2222 (or 999 if not in main site) and request switchboard operator to summon the fire service.

Arrange for any contaminated or exposed staff, patients or others to attend the Emergency Department if safe to do so for decontamination and ensure that a copy of the relevant COSHH assessment and safety data sheet is provided to the Emergency Department staff.

Notify any adjoining areas/departments that may be affected. Isolate and contain the area without endangering staff, patients or others (contain the spillage using a spill kit, open windows if possible and close doors).

Label the room / area with warning notices containing the spillage. Obtain the relevant COSHH assessments and safety data sheets. Notify the Duty Manager (888) and complete an incident form on Datix when possible.

For large spillages in the Community services, staff must ensure they follow their own local procedures as agreed by their Heads of Department or Line Manager.

All incidents involving a hazardous substance will be reported using Datix, the Trust’s incident reporting system as indicated in the Incident reporting and Management Policy (PP105 and 105b), and if appropriate reported to the HSE by the Health, Safety and Risk Manager as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

The Manager / Head of Department will ensure that the Occupational Health and Wellbeing Service is advised of the names of any member of staff who has or may have been exposed to a hazardous substance to enable health surveillance to be arranged if appropriate.
12.1 First Aid Measures
Review the first aid measures on the safety data sheet and transpose these onto the COSHH assessment. Ensure that an appropriately stocked and in date first aid kit is available, taking into consideration any special requirements e.g. treatment creams or eye baths. Ensure these are available and in date before the commencement of works.

13. Maintenance Examination and Test Control Measures
Control measures relating to ventilation e.g. Local exhaust ventilation (LEV) will be examined and tested at least every 14 months and records maintained by the Estates and Facilities Department with a copy held in the relevant department.

14. Monitoring Exposure
In accordance with COSHH Regulations, air monitoring for hazardous substances will be arranged by the Manager / Head of Department in cases where:-
- There could be serious risks to health if control measures were to fail or deteriorate.
- If you cannot be sure that exposure limits are not being exceeded.
- You cannot be sure that particular control measures are working properly and where exposure is monitored, records of that monitoring will be kept.

15. Health Surveillance
The Control of Substances Hazardous to Health 2002 (as amended), Regulation 11 and The Management of Health and Safety at Work Regulations 1999 Regulation 6 require every employer to ensure that where required, as a result of a suitable and sufficient risk assessment, health surveillance is in place to protect employee health.

If a known adverse health effect due to exposure to a substance hazardous to health is anticipated under the circumstances of the work, and can be readily observed, health surveillance is required to be carried out and a health record, comprising of the following will be maintained in the Occupational Health and Wellbeing Service as required by the Regulations:
- Surname
- Forename
- Gender
- Date of birth
- Permanent address and post code
- National Insurance Number
- Date when present employment started
- Historical record of jobs in this employment involving exposure to identified substances requiring health surveillance
- Conclusion in relation to the member of staff’s fitness for work and will include:
  1) A record of the decisions of the Medical Inspector or appointed Doctor
  2) Conclusions of the Medical Practitioner, Occupational Health Nurse, other suitably qualified or responsible person.

Health Surveillance comprises of strategies and methods to detect and systematically assess the adverse effects on the health of the worker.

a) Purpose of Health Surveillance
- Protect the health of individual employees by detecting as early as possible adverse changes which may be caused by exposure to substances hazardous to health.
- Help to evaluate the measures taken to control exposure.
- Collect, keep up to date and use data and information for determining and evaluating hazards to health.
Other purposes, e.g. assessing employee’s immunity

b) Criteria for Conducting Health Surveillance
- There is an identifiable disease or other identifiable adverse health outcome.
- The disease or health effect may be related to exposure.
- There is a likelihood that the disease or health effect may occur.
• There are valid techniques for detecting indications of the disease or health effects.

Health Surveillance programmes commence during the post-employment health interview when baseline surveillances are recorded and follow-up appointments arranged as necessary.

It is the Manager’s responsibility to advise the Occupational Health and Wellbeing Service of hazardous substances within the workplace which require health surveillance, e.g., Latex, Glutaraldehyde, Formaldehyde, Methyl Methacrylate, Entonox and any other hazardous substance identified, together with the names of those members of staff requiring regular health surveillance.

All new members of staff must be seen by the Occupational Health and Wellbeing Service during their induction in the first week of employment for base line health surveillance where need is identified by the Manager/Head of Department.

16. CMS (Chemical Management System) by Sypol
In order for the Trust to fully comply with the COSHH Regulations, the Trust has implemented a COSHH Management system called CMS by Sypol. The system is a Software Assisted Management service to support the process of compliance with the COSHH Regulations. The Trust currently has 9 Editor Licenses and 150 viewer only licences. The Editor licence allows the user to request new COSHH risk assessments and update their work areas as and when required. The viewer only licences only allow the user to access the system and print off relevant COSHH assessments. The COSHH Co-Ordinator will be responsible for the management of the system throughout the Trust.

17. Review and Monitoring
This policy will be reviewed two yearly or sooner if necessary e.g. changes in Legislation or where circumstances indicate, by the Health & Safety Committee.

The Departmental Manager/Head is responsible for monitoring compliance with this policy, as well as ensuring all members of staff identified at risk attend for health surveillance, and ensuring that all equipment is maintained regularly.

The Health and Safety Link Persons carry out workplace inspections to ensure that there is compliance with the completion of COSHH Assessments and reviews, advising managers of any non-compliance.

A report indicating compliance with Health Surveillance (100% attendance is requirement) will be issued annually by the Occupational Health and Wellbeing Service for the Managers information.

18. Development of the Policy and Procedure
a) Other Relevant Documents
Health, Safety & Welfare Policy PP018
Occupational Health Policy PP046
Policy for the use of Medicines PP200
Incident Reporting and Management PP105 and 105b
Health and Safety at Work etc. Act 1974
Management of Health and Safety at Work Regulations 1999
Control of Substances Hazardous to Health Regs 2002 (as amended) (COSHH)
Reporting of Injuries, Diseases and Dangerous Occurrences Regs 2013 (RIDDOR)

b) Changes compared to previous Documents
This document replaces PP (16)039 Control of Substances Hazardous to Health Policy. The revised document contains a general update.
c) Contributors and Peer Review
This document will be submitted to the Health & Safety Committee, for subsequent approval and endorsement.

d) Distribution and Implementation
This document will be widely circulated within the Trust, including all Heads of Department and Ward Managers and will be made available on the Trust's Intranet and Internet sites. Relevant changes will be brought to the attention of staff during circulation.

<table>
<thead>
<tr>
<th>Author(s):</th>
<th>Mike Dixon, Health, Safety and Risk Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other contributors:</td>
<td>Janie McAndrews, COSHH Co-Ordinator</td>
</tr>
<tr>
<td>Approvals and endorsements:</td>
<td>Health &amp; Safety Committee.</td>
</tr>
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<td>Issue no:</td>
<td>14</td>
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<td>File name:</td>
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<td>Implementation</td>
<td>See Section 14 d)</td>
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<tr>
<td>Monitoring: (give brief details how this will be done)</td>
<td>See Section 12</td>
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<tr>
<td>Other relevant policies/documents &amp; references:</td>
<td>See Section 14 a)</td>
</tr>
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<td>Additional Information:</td>
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Example of Sypol Inventory of Assessments

Appendix I

Assessments for JS0715 - Housekeeping (JS0715)

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<tr>
<th>Assessment ID</th>
<th>Risk Rating</th>
<th>Material Hazard</th>
<th>Material Code</th>
<th>Trade Name</th>
<th>Keyword</th>
<th>Supplier</th>
<th>Exp</th>
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<td>No</td>
<td>Yes</td>
<td>Yes</td>
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<td>MEDIUM</td>
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<td>2300489</td>
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<td>03480</td>
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<td>SPRINT HARD SURFACE CLEANER</td>
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<td>CAREFREE UNDERCOAT</td>
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<td>HUMAN / ANIMAL FACES</td>
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<td>HOSTSPEC LIQUID DETERGENT XGMOL</td>
<td>Cleaner</td>
<td>MORGENCE PLC MIDDLETOWN</td>
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<td>VAPROMAX DISCS AND SUPARAMAX CU</td>
<td>Air Freshener</td>
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<td>2388494</td>
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<td>TASK JONIC TENSOL FLC</td>
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<td>1944655</td>
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<td>182172</td>
<td>TURBO STRIP</td>
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<td>MEDIUM</td>
<td>224199</td>
<td>TECO CARE CONTROL CONCENTRATE - HIGH</td>
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<td>TALLEY ENVIRONMENTAL CARE</td>
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<td>Cleaner</td>
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# NEW CHEMICAL REQUEST FORM

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<tr>
<td>Name (printed):</td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td></td>
</tr>
<tr>
<td>COSHH Data sheet attached: Yes / No</td>
<td></td>
</tr>
<tr>
<td>COSHH Risk Assessment Completed Yes / No</td>
<td></td>
</tr>
<tr>
<td>(Risk Assessment must be completed before placing order)</td>
<td></td>
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<tr>
<td>Substance name:</td>
<td></td>
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<tr>
<td>Supplier / Manufacturer:</td>
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</tr>
<tr>
<td>Is this a new or replacement product?</td>
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## Hierarchy of control measures:

1) **Eliminate**- Can you completely remove the need for the substance?
   - Yes / No

2) **Substitute**- Have you considered substituting the chemical for a less hazardous alternative?
   - Yes / No

   **Reason for not substituting the chemical:**

3) **Engineering Controls**- Does the new product have to be used within a fume cupboard or have local exhaust ventilation installed?
   - Yes / No

4) **Change the work methods/patterns**- Can the use of the product change to emit less of the substance? I.e. brush instead of spray? Can the number of persons directly exposed to the chemical be reduced?
   - Yes / No

5) **Personal Protective Equipment (PPE)** - Are there adequate stocks of the correct PPE available? Has all staff been trained in its use?
   - Yes / No

   **Please provide details of the PPE needed for the chemical:**

---

**Signature:**

**Date:**

---

**RETURN THIS FORM ONCE COMPLETED, TO THE PURCHASING DEPARTMENT**