**Policy Checklist**

<table>
<thead>
<tr>
<th>Name of Policy:</th>
<th>Procedure for the Control of Substances Hazardous to Health (COSHH)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Purpose of Policy:</strong></td>
<td>The Trust is committed to promoting a safe working environment and has a duty under The Control of Substances Hazardous to Health Regulations (Northern Ireland) 2003 (as amended by the Control of Substances Hazardous to Health (Amendment) Regulations (Northern Ireland) 2005) to protect its employees and others and reduce any health and safety risks. These procedural arrangements describe the way in which the Regulations are implemented within the Trust to protect staff members and others who are exposed to hazardous substances at work.</td>
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<tr>
<td>Directorate responsible for Policy</td>
<td>Human Resources &amp; Organisational Development</td>
</tr>
<tr>
<td>Name &amp; Title of Author:</td>
<td>Mrs Ray King, Head of Health &amp; Safety</td>
</tr>
<tr>
<td>Does this meet criteria of a Policy?</td>
<td>Yes/No/Not Applicable</td>
</tr>
<tr>
<td>Trade Union consultation?</td>
<td>Yes/No/Not Applicable</td>
</tr>
<tr>
<td>Equality Screened by:</td>
<td>Mrs Ray King, Head of Health &amp; Safety</td>
</tr>
<tr>
<td>Date Policy submitted to Policy Scrutiny Committee:</td>
<td>22 September 2014</td>
</tr>
<tr>
<td>Members of Policy Scrutiny Committee in Attendance:</td>
<td>Vivienne Toal, Head of Employee Engagement &amp; Relations (Chair), Anita Carroll, Assistant Director of Acute Services – Functional Support Services, Dawn Ferguson, Practice Education Co-ordinator (Acting), Carmel Harney, Assistant Director of Allied Health Professionals, Governance &amp; Workforce Planning, Melanie McClements, Assistant Director of Older People's Services, Stephen McNally, Director of Finance &amp; Procurement, Stephen Wallace, Project Manager, Medical Directorate, Catherine Weaver, Head of ITS Programme Management</td>
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<tr>
<td>Policy Approved/Rejected/Amended</td>
<td>Approved</td>
</tr>
<tr>
<td>Policy Implementation Plan included?</td>
<td>Yes</td>
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<tr>
<td>Any other comments:</td>
<td>The principles outlined in this policy will be implemented through supporting health and safety procedures, guidance and training programmes and through health and safety audit arrangements</td>
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<tr>
<td>Date presented to SMT</td>
<td>22 September 2014</td>
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<tr>
<td>Director Responsible</td>
<td>Kieran Donaghy, Director of Human Resources &amp; Organisational Development</td>
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<tr>
<td>SMT Approved/Rejected/Amended</td>
<td></td>
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<tr>
<td>SMT Comments</td>
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<td>Date received by Employee Engagement &amp; Relations for database/Intranet/Internet</td>
<td>22 September 2014</td>
</tr>
<tr>
<td>Date for further review</td>
<td>2 year default</td>
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| **Title** | Title: Procedure for the Control of Substances Hazardous to Health (COSHH)  
Version: 3.0  
Reference number/document name: |
| **Supersedes** | Supersedes: Procedure for Control of Substances Hazardous to Health (COSHH) July 2012  
Description of Amendments(s)/Previous Policy or Version:  
2 year default review. |
| **Originator** | Name of Author: Mrs Ray King  
Title: Head of Health & Safety |
| **Scrutiny Committee & SMT approval** | Referred for approval by: Mrs Ray King, Head of Health & Safety  
Date of Referral:  
Scrutiny Policy Committee Approval (Date)  
SMT approval (Date) |
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Responsibility of (Name): Mrs Ray King  
Title: Head of Health & Safety |

**Circulation List:**
Directors (memo by Head of H&S) for dissemination within directorates
Health and safety committee
Intranet Policies and procedures
Procedure for
Control of Substances
Hazardous to Health (COSHH)

Health & Safety Department
May 2014
1.0 INTRODUCTION

The Southern Health and Social Care Trust (hereafter referred to as the “Trust”) recognises that there are particular health and safety risks posed to staff members when their employment requires them to come into contact with or are exposed to hazardous substances. The Trust is committed to promoting a safe working environment and has a duty under The Control of Substances Hazardous to Health Regulations (Northern Ireland) 2003 to protect its employees and others and reduce any health and safety risks.

These procedural arrangements describe the way in which the Regulations are implemented within the Trust to protect staff members and others who are exposed to hazardous substances at work.

2.0 SCOPE OF PROCEDURAL ARRANGEMENTS

These procedural arrangements apply to all employees and others who come into contact with or are exposed to hazardous substances.

3.0 DEFINITIONS AND GUIDANCE

COSHH – The Control of Substances Hazardous to Health is a law that requires employers to control exposure to substances that are hazardous to health. Details of the substances which are hazardous to health included in the COSHH (NI) Regulations are contained in Appendix 1.

COSHH does not apply to lead, asbestos, and radioactive substances as they have their own specific regulations, and substances whose hazard is due to their explosive, flammable, temperature (high or low) or high pressure characteristics.

For the vast majority of commercial chemicals, the presence of a warning label will indicate whether COSHH (NI) is relevant.

Hazardous Substances - all substances are likely to cause adverse health effects if not properly controlled. Hazardous substances will be present in the working environment in many forms and concentrations and can include:

- Substances used directly in work activities (e.g. adhesives, paints, cleaning agents)
- Substances generated during work activities (e.g. plaster dust)
- Naturally occurring substances (e.g. blood and body fluids)
- Biological agents - any micro-organism, cell culture, or human endoparasite, including any which have been genetically modified, which may cause infection, allergy, toxicity or otherwise create a hazard to human health such as bacteria and other micro-organisms.

Examples of the effects of hazardous substances include skin irritation or dermatitis as a result of skin contact; asthma as a result of developing an allergy to substances used at work; losing consciousness as a result of being overcome by toxic fumes; cancer, which may appear long after the exposure to the chemical that caused it; infection from bacteria and other biological agents.
Material Safety Data Sheets (MSDS) - are invariably required to carry out a COSHH Risk Assessment and should be provided under the European REACH (Registration, Evaluation, Authorisation and Registration of Chemicals) Regulations with the product. The MSDS provides detailed information on the substance and guidance on the safe handling, use and disposal of the substance.

Control Measure - a measure that once implemented reduces the level of risk. Some control measures are more effective than others. The use of control measures that are not dependent upon human response are usually preferable to those that do, since there is reduced scope for failure. The hierarchy of control measures is contained in Appendix 2.

Local Exhaust Ventilation (LEV) - Local exhaust ventilation are designed systems that prevent the dispersion into the air of dusts, fumes, mists, vapours, and gases in concentrations causing harmful exposure. The system consists of hoods, ducts, a fan and possibly an air-cleaning device. If you use LEV to control exposure, it needs regular checking and thorough examination and testing by a competent person every 14 months (refer to LEV Testing Procedure by clicking here)

Personal Protective Equipment (PPE) - all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects him against one or more risks to his health or safety, e.g. safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses. Users need to know exactly how to check and maintain PPE, because if it fails, it no longer provides protection and exposes the user to dangerous substances.

Workplace Exposure Limit (WEL) – WEL’s are Exposure Limits set under the COSHH Regulations, for certain hazardous substances in order to help protect the health of workers. WEL’s are concentrations of hazardous substances in the air, averaged over a specific period of time and published in EH40.

4.0 COSHH RESPONSIBILITIES

4.1 Director of Human Resources and Organisational Development

The Chief Executive has appointed the Director of Human Resources and Organisational Development as the identified Lead person for Health and Safety within the Trust. This includes responsibility for ensuring that the requirements for health and safety legislation are applied and that the COSHH Procedural Arrangements are observed and brought to the attention of management. The Head of Health & Safety supports the Director in achieving this.

4.2 Directors

It is the responsibility of Directors to:

- Disseminate these procedures within their area of responsibility; and
- Ensure the implementation of the procedures within their area of responsibility by providing support and advice to their managers.
• Ensure the provision of resources to minimise risk as identified through the risk assessment process.

4.3 The Manager

Managers are responsible for:

• Ensuring that this procedure is shared with staff and they are aware of their responsibilities.

• Identifying all substances within their area of responsibility using Appendix 3 and ensuring that Material Safety Data Sheets (MSDS) are available for the substances identified.

• Ensuring that MSDS’s are available for any new substances before they are brought into their area of responsibility.

• Staff should be given a completed copy of Appendix 3 to make them aware of the hazardous substances they are likely to come into contact with. Arrangements should be in place to ensure that all new and existing staff are aware of current hazards and control measures.

• Identifying a COSHH Assessor(s) for their area of responsibility (This can be the Manager or a competent person(s) with authority designated by the Manager).

• Ensuring the COSHH Assessor(s) receives COSHH Assessor Training.

• Ensuring that COSHH risk assessments are undertaken, a copy kept and the findings shared with staff. When a new risk assessment is completed it is important that the old assessment must not be thrown away.¹

• Developing written safe systems of work to protect staff.

• Ensuring that any remedial action or control measure highlighted through a COSHH risk assessment is carried out and communicated to staff. Managers should utilise the Trust Risk Management Strategy when risks require to be escalated.

• Ensuring that a suitable, lockable storage area(s) is available for the storage of hazardous substances.

• Ensuring that appropriate Personal Protective Equipment (PPE) is provided, when no other method of controlling the risk is deemed appropriate by the COSHH risk assessment, and that training is given in the correct use, storage, maintenance and disposal of single use PPE.

¹ Good record keeping is important as health conditions can take many years to develop. When a new assessment is completed it is important that the old assessment must not be thrown away. As many health issues can take many years to develop it is recommended that records are kept in line with the Records Retention Schedule.
• Ensuring staff working with or exposed to hazardous substances are provided with suitable and sufficient information, instruction, and training.

• Ensuring that staff are supervised to ensure the safe use of hazardous substances as appropriate to the associated hazard and risk.

• Arranging for appropriate health surveillance and/or environmental/air monitoring where your risk assessment has shown this is necessary or where COSHH (NI) sets specific requirements (refer to air monitoring procedure by clicking here).

• Ensuring that where a staff member reports COSHH related health problems they are referred immediately to Occupational Health for specialist advice and support.

• Ensuring that plans and procedures are in place to deal with accidents, incidents and emergencies involving hazardous substances where necessary and they are reviewed periodically.

• Ensuring that hazardous substances are disposed of as per the arrangements contained in the material safety data sheet.

• Ensuring that control measures in place are consistent with the COSHH risk assessment. These should be regularly monitored to ensure they are appropriate to the activity, practical to implement and that staff adhere to them to ensure their continuing effectiveness ensuring that any deficiencies are acted upon.

• Ensuring that a record of COSHH assessments with other relevant documentation relating to the assessment are retained in accordance with the Trust’s Records Retention Schedule e.g. safe systems of work, PPE records, environmental/air monitoring records, LEV records training/supervision records, disposal records/health surveillance, emergency arrangements, checks and inspections and adverse incidents.

• Ensuring that they maintain a record of training for their own staff using the Trust’s Team Training Record which can be accessed by clicking here.

4.4 Employee Responsibilities

All employees of the Trust have a legal duty to take reasonable care of their own and others health and safety when using hazardous substances.

All employees must ensure that they:

• Familiarise themselves with these Procedural Arrangements together with other relevant policies and procedures.

• Co-operate and comply with the COSHH Procedural Arrangements and make themselves aware of, and follow, local arrangements, safe systems of work and control methods provided to minimise risks to health and safety.

• Ensure they are familiar with the hazardous substances in their department and the risks associated with these.
• Ensure hazardous substances are handled safely (e.g. only use substances displaying the manufacturers label in the correct container.

• Co-operate and assist with COSHH risk assessments as required, and bring to the notice of the manager any changes in labelling, packaging or physical properties of substances used at work.

• Make full use of any risk control measures including Personal Protective Equipment (PPE) provided. This should be regularly checked and any defects reported to their manager.

• Complete appropriate COSHH training as required.

• Participate in Health Surveillance/environmental/air monitoring that has been identified where necessary.

• Promptly report all incidents concerning the use, storage and disposal of hazardous substances, in accordance with the Trust’s Adverse Incident Policy.

• Report any problems relating to COSHH to your manager. Any staff member experiencing any adverse ill health effects arising from exposure to hazardous substances should immediately consult their manager for further advice.

5.0 STORAGE OF HAZARDOUS SUBSTANCES

A suitable lockable storage area must be available for the storage of hazardous substances and good housekeeping practices must be observed (e.g. ensuring the area is secured at all times, returning substances to lockable area after use, and ensuring containers don’t leak). All containers must be appropriate to the substance and display the manufacturer’s label. Substances should be stored according to the manufacturer’s instructions on the material safety data sheet, keeping the minimum stock of substances necessary. Consideration should be given to the storage of incompatible substances separately.

6.0 DISPOSAL OF HAZARDOUS SUBSTANCES

Hazardous substances are required to be disposed of for a number of reasons, for example, a product may be replaced by an alternative or excess product which cannot be returned to the manufacturer and needs to be disposed of.

To ensure the safe disposal of hazardous substances the following steps should be taken:

• Check the disposal information contained on the MSDS.

• Ensure the hazardous substance is correctly labelled and placed in a secure area for collection.

• Notify the Specialist Estates Officer (Environment) of the hazardous substance to be disposed of. (A copy of the COSHH risk assessment and material safety data sheet for
the substance should be emailed together with an estimate of the volume of the substance, details on how the substance is contained and where the item can be collected from).

- If the hazardous substance cannot be identified contact the Specialist Estates Officer (Environment) for further advice.

7.0 EMERGENCY/ACCIDENTAL RELEASE

It must be a normal part of the risk assessment procedure that you consider the need for special procedures to be used in the event of an accidental release or exposure to the substance(s) in question.

It may be necessary to formulate plans with relevant others e.g. local departments and agencies where appropriate.

Staff should be aware of any emergency arrangements and practice to ensure effectiveness.

8.0 HEALTH SURVEILLANCE

Where staff are exposed to a substance linked to a particular disease or adverse health effect, such as occupational asthma or dermatitis, they may require health surveillance. Advice should be sought from the Occupational Health Department when health surveillance is necessary.

Health surveillance must be carried out before staff are deployed in any area where exposure to a substance linked to a particular disease or adverse health effect may occur and then at regular intervals throughout their employment, normally annually. Health records for health surveillance carried out will be retained by Occupational Health. Records must be retained in line with the Trusts Records Retention Schedule.

9.0 ENVIRONMENTAL/AIR MONITORING

Where a hazardous substance has been assigned a Workplace Exposure Limit (WEL), published in EH40/2005 (as consolidated with amendments 2007) Workplace exposure limits, and/or following a risk assessment, environmental/air monitoring is undertaken to ensure that these limits are not exceeded. Environmental/Air Monitoring may also be required in response to health concerns.

Any environmental/air monitoring results relevant to individual members of staff should be kept by the line manager.

Advice should be sought from the Health and Safety Department when environmental/air monitoring is required.
9.1 LEV TESTING

Where extraction equipment is identified through a COSHH Risk Assessment and/or is fitted e.g. Local Exhaust Ventilation (LEV), this must be tested at least every 14 months (minimum). An asset number must also be obtained from Estate Services. Records of the examination and test should be kept for at least 5 years (refer to LEV Testing Procedure by clicking here).

10.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE should be seen as a last resort in the hierarchy of control measures. PPE must be provided to employees exposed to a risk to their health or safety except where the risk has been adequately controlled by other equally, or more effective means.

All PPE must:
- Be suitable
- Be appropriate to the risks and workplace conditions
- Take into account the ergonomics and state of health of the person
- Be capable of fitting the wearer correctly
- Be effective in preventing or adequately controlling the risk without increasing an overall risk.

Where more than one piece of PPE is required to be used at the one time then all pieces of PPE must be compatible.

PPE must be maintained (including replaced or cleaned as appropriate) in an efficient state, in efficient working order and in good repair. Responsibilities, procedures (including frequencies) should be established and appropriate records kept. Suitable accommodation must be provided for the safe storage of PPE. Contaminated or defective PPE should also be segregated. Employees should report any PPE that is lost or defective.

Information, instruction and training needs to be provided in a systematic way.

Any records associated with PPE must be kept in line with the Trusts Records Retention Schedule.

11.0 COSHH RISK ASSESSMENT REVIEW

The COSHH risk assessment should be a ‘living’ document, and should be reviewed every 3 years as a minimum and in particular when circumstances change. Prompts for review include:

- A reason to suspect the assessment is no longer valid.
- There has been a significant change in work procedures, processes, machinery, control systems, substances used or the amounts of substances involved.
- The result of environmental/air monitoring shows it to be necessary.
12.0 TRAINING AND INFORMATION

Staff are required to undertake COSHH Awareness training every 3 years (refer to Training section on the intranet). COSHH Assessors are required to attend COSHH assessor training at 3 yearly intervals. The COSHH Assessor training will be organised by the Health and Safety Department.

Managers are required to ensure that staff are provided with suitable and sufficient information, instruction and training. This may include additional information, instruction and/or training in relation to specific substances, the use of equipment, the use of PPE, safe systems of work and knowledge of how to deal with spillages and emergencies etc.

The Health and Safety department will provide on-going support and advice as required. Additional support and specialist advice is also available from the Occupational Health Department and Estates Services.

13.0 EQUALITY AND HUMAN RIGHTS

The Trust’s equality and human rights statutory obligations have been considered during the development of these Procedural Arrangements.

14.0 REVIEW OF THE PROCEDURE

The Head of Health and Safety will review these Procedural Arrangements within 2 years or earlier in the light of any changes in statutory legislation and/or operational experience that prevents these procedural arrangements being implemented as intended.

15.0 ALTERNATIVE FORMATS

This document can be made available on request in alternative formats, e.g. plain English, Braille, DAISY, audiocassette, disk and in other languages to meet the needs of those who are not fluent in English.

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APPENDIX 1

Substances Hazardous to Health

The following substances hazardous to health are included in the Control of Substances Hazardous to Health (COSHH) (NI) Regulations:

- Substances or mixtures of substances classified as dangerous to health under the Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP Regulation).

  These can be identified by their warning label and the supplier must provide a safety data sheet for them.

- Substances with workplace exposure limits are listed in the Health & Safety Executive (HSE) publication EH40/2005 (as consolidated with amendments 2007) Workplace Exposure Limits.

- Biological agents (bacteria and other micro-organisms), if they are directly connected with the work, such as with farming, sewage treatment or healthcare or if the exposure is incidental to the work (e.g. exposure to bacteria from air-conditioning system that is not properly maintained).

- Any kind of dust if its average concentration exceeds the levels specified in COSHH (NI).

- Any other substance which creates a risk to health, but which for technical reasons may not be specifically covered by CLP Regulation including:
  - asphyxiants (i.e. gasses such as argon and helium, which, while not dangerous in themselves, can endanger life by reducing the amount of oxygen available to breath)
  - pesticides
  - medicines
  - cosmetics
  - substances produced in chemical processes.
Hierarchy of Control Measures

In order to comply with the regulations, once you identify and prioritise the hazardous substances, you must implement appropriate control measures.

The hierarchy of control measures for hazardous substances are:

- Eliminate – question whether you really need to use this substance.
- Substitute – identifying and changing to a safer alternative substance or substituting a different form of the substance.

(Always consider elimination or substitution of the substance as the primary control)

- Reduce – look at the amounts you use and store on your premises. Reducing the amount of hazardous material used in your process will reduce potential exposure, particularly if you reduce the amounts you order and store on your premises. Handling smaller amounts of the substance, at every part of the process, should reduce the amount of any spillage.
- Isolate or Enclose – separate workers from the hazard. Isolation of the task by moving it to a less used part of the premises may reduce the numbers of people who may be exposed. Changing the frequency a task is carried out or reducing the number of people in the vicinity will also reduce exposure.
  - Closed systems are commonly used in industries for small, medium and large-scale use of solids and liquids and need to be designed specifically for the task.
- Ventilate – use local exhaust ventilation or general ventilation. The use of ventilation can reduce exposure; the type used will depend on the health hazards, amount in use, volatility, etc. The types available are:
  - General ventilation can be natural ventilation from doors and windows or controlled, where air is supplied or removed by a powered fan. This type of ventilation is only suitable for low level hazards.
  - Local exhaust ventilation (LEV) is the commonest form of engineering control. It can be applied to a range of tasks involving small, medium and large-scale use of solids and liquids.

You will need to maintain your ventilation systems and test them every 14 months so you may need specialist advice.

- Personal Protective Equipment – this should be the last resort. Provision of personal protective equipment (PPE) is a further control measure. This is regulated under the Personal Protective Equipment Regulations (NI) 1993. The main requirement of these regulations is that personal protective equipment is to be supplied and used at work.
wherever there are risks to health and safety that cannot be adequately controlled in other ways. Employees will need to know why they require PPE and will need training to use it correctly. Remember that if PPE fails, it offers no protection at all.

• Hygiene Procedure – personnel need training to ensure they follow the correct procedures. Good hygiene can be a simple but effective control measure by ensuring that employees:
  
  o Only eat and drink in designated areas that are free from contamination.
  o Practice a high standard of personal hygiene and especially:
    - wash hands and face and scrub nails before eating, smoking or drinking
    - wash and/or shower and change if necessary before going home

• Provide warning signs. A final control measure is the use of signs to warn employees and others of the hazards in the work area.
APPENDIX 3

List of Substances Hazardous to Health

Location: ____________________________  Division: ____________________________

Directorate: ____________________________

<table>
<thead>
<tr>
<th>Name of Hazardous Substance used</th>
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Name of Manager (please print: ____________________________)

Signature: ____________________________  Date: ____________________________