Health and Safety

NHS
University Hospitals of Derby and Burton
NHS Foundation Trust

Safety Management Standard

Control of Substances Hazardous to Health (COSHH)

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Document Control

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1.0. Introduction

Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended) is the law that requires employers to control substances that are hazardous to health. The objective of COSHH is to prevent, or to adequately control, exposure to substances hazardous to health, so as to prevent ill health. Hazardous substances include both chemical and biological agents and can take many forms which include:

- Chemicals
- Products containing chemicals
- Fumes
- Dusts
- Vapours
- Mists
- Nanotechnology
- Gases and asphyxiating gases
- Biological agents. If the packaging has any of the hazard symbols, then it is classed as a hazardous substance.
- Bacteria and viruses that cause diseases such as leptospirosis or legionnaires disease and pathogens used in laboratories.

These can cause significant ill health to employees, patients and others.

Examples include:

- Exposure to blood borne viruses, such as HIV, Hep B and C, from handling bloods
- Exposure to wet work, causing skin diseases such as dermatitis
- Handling of chemicals such as formaldehyde and cytotoxic drugs
- Handling of cleaning and maintenance products

2.0. Purpose and Outcome

This safety management standard (SMS) supplements the Trust Health and Safety Policy and outlines the arrangements for complying with COSHH, with the aim of having effective arrangements in place to manage the risks from substances hazardous to health.

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3.0. Definitions Used

COSHH

An abbreviation for 'control of substances hazardous to health'.

Hazardous Substance

Can be described as toxic or very toxic, harmful, corrosive, irritant, mutagenic or carcinogenic.

Those that have a workplace exposure limit as approved by the Health and Safety Executive (HSE).

Dust of any kind (if not already covered by the descriptions above) when it is present at concentrations in the air equal to or greater than 10 mg/m3 (as a time-weighted average over an eight-hour period) of inhalable dust or 4 mg/m3 (as a time-weighted average over an eight-hour period) of respirable dust.

Exposure

Exposure to a substance is uptake into the body. The exposure routes are:

By breathing fume, dust, gas or mist.
By skin contact.
By injection into the skin.
By swallowing

Workplace Exposure Limit (WEL)

A WEL is the maximum concentration of an airborne substance, averaged over a reference period, to which an employee may be exposed by inhalation.

Safety Data Sheet (SDS)

Safety data sheets provide information on chemical products that help users of those chemicals to make a risk assessment. They describe the hazards the chemical presents, and give information on handling, storage and emergency measures in case of accident.

NB: Safety data sheets are not a risk assessment, but information contained with them should be used to carry out a COSHH risk assessment.

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4.0. Law

This Standard is produced to ensure compliance with:

- The Health and Safety at Work Act 1974

- The Management of Health and Safety at Work Regulations 1999

- The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended)

- The Dangerous Substances and Explosive Atmospheres (DSEAR) Regulations 2002 to some extent.

5.0. Key Responsibilities / Duties

Employers' Responsibilities

University Hospitals of Derby and Burton NHS Foundation Trust must carry out a general risk assessment for their employees to assess all health and safety risks they are exposed to while at work. As part of that process, employers should consider all employees, including bank, locum, agency and contractors assessing the risks that may arise from any process, working condition or physical, biological or chemical agents.

- Monitor whether risk assessments are being carried out and reviewed
- Ensure the provision of control measures to reduce the risk of exposure to hazardous substances
- Oversight of the maintenance, examination and testing of control measures
- Provision of resource (personnel and equipment) for face fit testing
- Provision of exposure monitoring
- Provide health surveillance for employees and keep records
- Ensure health records are kept for a minimum of 40 years
- Provide training on COSHH and maintain training records
- Ensure adequate emergency arrangements are in place

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Managers Responsibilities

- Ensure that risk assessments are carried out for work activities under their supervision and are recorded and reviewed
- Directly participate in the risk assessment process
- Maintain a record of risk assessments
- Communicate the findings of the risk assessment to staff and others under their management
- Ensure the selection of appropriate control measures recommended by Alcumus Sypol are adhered to
- Communicate to staff and students for whom they have management responsibility, the control measures required and give instructions for correct use
- Ensure control equipment is maintained and kept in a clean condition
- Ensure local exhaust ventilation is tested every 14 months and that any failures are rectified
- Identify where RPE is required and ensure face fit testing of the same
- Determine whether exposure monitoring is required for the work under their management and make arrangements for monitoring if required
- Act on the findings of exposure monitoring where necessary
- Determine whether health surveillance is required for the work under their management and make arrangements with Occupational Health for the same
- Provide training of staff and students in processes and use of equipment (Including control measures) for work under their management
- Supervise staff and students for whom they have management responsibility until they are deemed competent
- Maintain records of training and competency assessment
- Ensure adequate emergency procedures are in place and ensure communication to staff for which they are responsible
- Report accidents, incidents and near misses

Employees Duties

- Follow information given in the risk assessment
- Use control measures where the risk assessment has identified that they are required
- Inspect control measures before use and report defects or failures to line managers
- Attend face fit tests where required
- Attend appointments for health surveillance if it has been deemed necessary
- Attend training courses when requested
- Understand the emergency procedures relevant to their work

6.0. Standards

The following standards must be adhered to.

6.1. Risk Assessment

No work involving hazardous substances (as defined by COSHH) should be undertaken until a suitable and sufficient risk assessment has been carried out.

COSHH risk assessments are generated by a COSHH assessment request form on Net-i.
https://neti.uhdb.nhs.uk/hsw-health-and-safety-control-of-substances-hazardous-to-health/

COSHH risk assessments are produced using the Alcumus Sypol COSHH management system which produces legally compliant task-based risk assessments.

Risk assessments produced, use simple, easy to read pictograms to communicate the necessary control measures for the particular method, process or exposure of a substances.

A COSHH risk assessment interpretation manual is available to download on Sypol via the viewer login. This can be accessed on Net-i, via Quick links, under staff and non-clinical systems.

This manual is designed to help you get the best out of Alcumus Sypol CMS and provide an interpretation of all the information which may appear on your assessments.

It is advised that each department nominates a COSHH assessor who will undertake the following:

1. Identify hazardous substances used and/or exposed to

2. Where possible obtain an up-to-date Safety Data Sheet (SDS) for each substance

3. Complete a COSHH Assessment Request Form

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4. Send completed COSHH assessment request form and SDS to the Health and Safety generic email dhft.healthandsafety@nhs.net

5. The Health and Safety Team will then submit the relevant information to the Alcumus Sypol team for the assessment to be compiled

6. In approximately 5 working days a task-specific evaluation of the risk will be completed and a COSHH compliant assessment will be available to be viewed/downloaded using the Sypol viewer login via Quick links

7. Communicate and implement the findings of the risk assessment

8. File the risk assessment (COSHH summary sheet) in the COSHH folder and review as necessary

Records of risk assessments should be kept and the findings of the risk assessment communicated to staff and others as necessary.

Risk assessments should be reviewed immediately if there is reason to believe it is no longer valid, if there is a significant change in the work activity to which it relates or if the results of health surveillance, or exposure monitoring indicate it to be necessary.

6.2. Selection and Application of Control Measures

Exposure to hazardous substances should be prevented by elimination of the hazardous substance or substitution of a safer alternative or form.

Where the above is not reasonably practicable, exposure should be reduced to as low as possible by the application of additional control measures as indicated on the risk assessment.

You can do this by:

- Using control equipment, e.g., total enclosure, partial enclosure, Local Exhaust Ventilation and the use of Personal Protective Equipment

- Controlling procedures, e.g., ways of working, supervision and training to reduce exposure, maintenance, examination and testing of control measures

- Worker behaviour, ensuring employees follow the control measures such as the wearing of Personal Protective Equipment, following local procedures and warning supervisors or managers if anything appears to be wrong

- Changing how often a task is undertaken, or when, or reducing the number of employees nearby

The requirement and consideration of the selection and application of control measures will be specified on the COSHH risk assessment.

6.3.   Maintenance, Examination and Testing of Control Measures

Control equipment including PPE should be maintained in good working order and kept in a clean condition. Control measures should be visually inspected before use.

More specially, local exhaust ventilation (LEV) is subject to a thorough examination every 14 months.

Tight fitting respiratory protective equipment (RPE) should be face fit tested to the individual user.

Records should be kept for a minimum of 5 years.

The requirement for maintenance, examination and testing of control measures will be specified on the COSHH risk assessment.

6.4.   Exposure Monitoring

Exposure monitoring is a way of measuring the extent of exposure to hazardous substances in the air during a specific task to show that control measures are adequate. It has nothing to do with the state of a worker's health. That is assessed through health surveillance.

Monitoring is appropriate:

- When you need to show compliance with a WEL (Workplace Exposure Limit)

- When you need to show that control equipment or personal protective equipment is working well enough.

The requirement for exposure monitoring will be specified on the COSHH risk assessment.

6.5. Health Surveillance

Health surveillance is any activity which involves obtaining information about employees' health and which helps protect employees from health risks at work.

The objectives for health surveillance are:

- Protecting the health of employees by early detection of adverse changes or disease
- Collecting data for detecting or evaluating health hazards
- Evaluating control measures

It should not be confused with general health screening or health promotion.

Health surveillance is necessary when:

- There is a disease associated with the substance in use (e.g., Asthma, Dermatitis, Cancers)
- It is possible to detect the disease or adverse change and reduce the risk of further harm
- The conditions in the workplace make it likely that the disease will appear

Health surveillance is a process; it may be a regular planned assessment of one or more aspects of a worker's health, for example: lung function or skin condition.

The requirement for health surveillance will be specified on the COSHH risk assessment.

For further advice contact the Health and Safety and /or Occupational Health team.

6.6. Emergency Procedures

Arrangements should be in place to respond to reasonably foreseeable accidents, incidents and emergencies involving hazardous substances. Procedures in the event of a spillage, first aid incident or fire will be specified on the COSHH risk assessment.

Accidents, incidents and near misses involving exposure or potential exposure to hazardous substances should be reported through the online incident reporting system (DATIX).

7.0. Information, Instruction, Training and Supervision

Managers are responsible for ensuring that information, instruction and training is provided when a new member of staff is employed, a substance is being used or there has been a change in work practice.

Training should be provided to staff to ensure they have a full understanding about the nature of the substances they work with or are exposed to, and the risks created by exposure to those substances and the precautions that should be taken.

Staff should be given sufficient information and instructions on:

- Control measures, their purposes and how to use them
- How to use Personal Protective Equipment and any clothing provided
- Emergency procedures

Staff need to understand the outcome of COSHH risk assessments and what it means for them.

Tell them:

- What the hazards and risks are
- Any workplace exposure limits
- The results of any exposure monitoring
- General results of any health surveillance
- What to do if there is an accident, spillage or emergency

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COSHH awareness training and advice is provided by the Health and Safety Team and advice may also be sought from Occupational Health, Infection Control, Procurement and other competent person(s).

Staff should have access to the COSHH risk assessments and ideally, they should be stored in a central area.

Safety data sheets should be accessible to staff, or they should be informed how to access them on Sypol.

Staff should be informed about planned future changes in processes or substances used and basic training records should be retained.

Supervision of staff is very important to ensure control measures are being adhered to.

Staff must be aware that failure to wear personal protective equipment can lead to disciplinary action.

8.0. Monitoring & Review

The Health and Safety Team will carry out auditing and monitoring of compliance with this management standard.

9.0. Further information

The Health and Safety Executive (HSE) has a range of information on COSHH risk management. Information is available at: COSHH assessment: Identifying hazard and assessing risk (hse.gov.uk)

For information on specific risks consult one of our other health & safety management standards or use the search function at http://www.hse.gov.uk/.

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For further advice, please contact the Health and Safety Team.

We hope you find this SMS useful; if you require further information, please contact one of the Health and Safety Team:

☎	General enquiries during normal hours	07385 411684
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		07385 343668
		07387 248730
	Out of Hours	07385 343631
		07385 411682
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