

Control of Substances Hazardous to Health (COSHH) Procedure

Ref HS-0001-013-v2

Status: Approved

Document Type: Procedure

Contents

1	Purpose	3
2	Related Documents	3
3	Procedure.....	4
3.1	COSHH – Flow Chart.....	4
3.2	COSHH Guidance Notes	5
3.3	COSHH Risk Assessment	6
3.4	Hazard Symbol Identification	7
3.5	COSHH Risk Assessment	8
3.6	Monitoring and Health Surveillance.....	9
4	Definitions	10
5	How this Procedure will be Implemented.....	10
5.1	Training Needs Analysis	10
6	How the Implementation of this Procedure will be Monitored.....	11
7	References	11
8	Document Control	11
9	Appendices	12
9.1	Appendix 1.....	13
9.2	Appendix 2.....	17

1 Purpose

Following this procedure will assist with identifying and managing substances which have been identified as hazardous to health.

2 Related Documents

This procedure describes what you need to do to implement the COSHH section of the Health and Safety Policy.

This procedure describes what you need to do to complete a risk assessment for any identified hazardous substances used within the work environment.



The Health and Safety Policy defines roles and responsibilities which you must read, understand and be trained in before carrying out the procedure described in this document.

This procedure also refers to:

- ✓ Health & Safety Policy
- ✓ Incident Reporting and Serious Incident Review Policy
- ✓ COSHH Risk Assessment
- ✓ Personal Protective Equipment Regulations
- ✓ Transport of Dangerous Goods Act
- ✓ [Hotel Services COSHH Assessments](#)

3 Procedure

3.1 COSHH – Flow Chart



All hazardous substances must be purchased through Cardea.
 Staff **should not** bring in their own COSHH substances at anytime.

Procedure	Guidance/Information
<p>Make an inventory of all hazardous substances in the department, unit or ward.</p>	<p><i>Use COSHH inventory to list all substances.</i></p>
<p>When obtaining new substances seek advice from Procurement (Cardea).</p>	<p><i>Procurement – Cardea (0191) 333 2616</i></p>
<p>Obtain safety data sheets and information regarding the use, storage and disposal before using any (hazardous) substances.</p>	<p><i>Safety data sheets should be supplied with first order, if not contact supplies or supplier/manufacturer./access from internet.</i></p>
<p>Carry out a written COSHH assessment before using any (hazardous) substances.</p>	<p><i>Use the COSHH assessment template form. Appendix 1.</i></p>
<p>Identify and implement control measures to remove or reduce personal exposure. Where engineering controls or work procedures cannot reduce risk ensure appropriate Personal Protective Equipment (PPE) is ordered and signed for. Communicate the actions and findings for all relevant staff.</p>	
<p>Review the COSHH Assessment on a regular basis or if the work activities (including products) significantly change.</p>	

3.2 COSHH Guidance Notes

Hazard identification:

In order to control the risks associated with handling substances, it is essential to first ensure you have identified all hazardous substances.

Reference to product labels and safety data sheets may assist with identifying which chemical substances are harmful and the type of harm they may cause.

You should not be just thinking about the main substances involved.

The work processes may produce other hazardous substances such as intermediates in chemical reactions, or by-products such as dusts, fumes, vapours or breakdown products. All these substances need to be fully considered, so it is important to not just rely on the safety data sheets alone to provide you with your list of hazards.

Hazardous substances include:

- Substances used directly in work activities (e.g. adhesives, paints, cleaning materials etc.)
- Substances generated during work activities (e.g. fumes, dusts, vapours etc.)

Examples of substances:

- Adhesives
- Cleaning products
- Degreasers
- Paints, varnishes, solvents
- Wood dust
- Cement dust
- Welding fumes
- Biological agents
- Pesticides etc.

How are these types of substances hazardous to health?

In consideration of the task, it is important to think about how workers might be exposed.

The substances described are either solid, liquid, gas, fumes or vapours and can enter the human body through a variety of different routes:

- Inhalation – breathing in the gases, fumes, mist or dust
- Ingestion – swallowing the substances
- Absorption – through the skin by direct contact or via mucous membranes
- Eye contact – through direct contact with one or both eyes
- Injection – via skin puncture

Once harmful substances are directly on the skin or have entered into the body via inhalation, ingestion or absorption they can lead to a range of ill-health effects.

Some of these ill-health effects can be acute; for example immediate skin irritation.

Some of these ill-health effects can be chronic; for example they can lead to ill health a long time after the exposure has initially occurred.

3.3 COSHH Risk Assessment

A COSHH risk assessment concentrates on hazards and risks from hazardous substances in your workplace. See Appendix 1 for COSHH assessment template.

A risk from a hazardous substance arises when you use it.

The level of risk depends on the amount you are exposed to, how long you are exposed for and frequency of exposure, sometimes additional personal factors (such as genetics and/or previous exposure to the substance).

It is essential for the COSHH assessment to consider how and where during the process or task undertaken the exposure can occur and how significant the exposure is likely to be.

Once the potential sources and points of exposure have been identified as part of the hazard identification process an assessment should:

- Identify which substances are brought in or are produced during work activities
- Identify which substances are harmful by reading the product labels and safety data sheets (SDS) (if in doubt contact your supplier)
- Remember to identify harmful substances that have been produced by your processes which workers may be exposed to (e.g. fumes, dusts, vapours etc.)
- Design and operate processes and activities to minimize emission, release and spread of substances hazardous to health
- When developing control measures take into account all relevant routes of exposure: inhalation, ingestion, skin absorption, injection and eye contact
- Control exposure by measures that are proportionate to the health risk
- Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment (PPE)
- Check and regularly review all elements of control measures for their continuing effectiveness.
- Inform and train all employees affected by the hazards and risks from the substances with which they work in, and the use of those control measures developed to minimize risk.
- Ensure that the introduction of control measures does not increase the overall risk to health and safety
- Appropriate storage of chemicals and control of access
- Spillages/controls for accidental release
- Firefighting provisions
- Emergency provisions i.e. eye wash, drench showers etc.



Remember – The assessment should be a 'living' document!

3.4 Hazard Symbol Identification

There are 9 pictograms (international symbols) as shown in the table below:

All have white background with red diamond frame and black hazard symbol inside.





Chemicals are classified into 2 broad categories:






- Physical hazards (flammables, explosives, corrosives)
- Health Hazards (acute toxicity, irritant, carcinogen and several others)

Each substance now has a 'Danger' or 'Warning' on the label, unless it is deemed of such low hazard as to not require one.

- Danger = more severe hazards
- Warning = less severe hazards

All pictograms relating to transport are still governed by "The Transport of Dangerous Goods" Regulations.

New Pictogram	Description	Hazard Class and Hazard Category
	Skull & Cross bones	Acute toxicity (fatal or toxic) (oral, dermal, inhalation)
	Exclamation mark	Irritant (skin and eye) Skin sensitizer / Skin irritation Acute toxicity (oral, dermal, inhalation) Eye irritation Narcotic effects Respiratory tract irritant Skin sensitization Specific Target Organ Toxicity Single exposure Hazardous to ozone layer (none mandatory)
	Environment	Aquatic toxicity Hazards to Aquatic Environment Acute hazard Chronic hazard
	Health Hazard	Respiratory sensitization Germ cell mutagenicity Carcinogenicity Reproductive toxicity Specific Target organ toxicity - single exposure Specific Target organ toxicity – repeated exposure Aspiration hazard

	Corrosion	Skin corrosion / burns. Serious eye damage Corrosive to metals
	Flame over circle	Oxidizers Oxidizing gases Oxidizing liquids
	Flame	Flammables Flammable gases Flammable aerosols Flammable liquids Flammable solids Self-reactive substances and mixtures Self-heating substances Pyrophoric liquids Pyrophoric solids Substances & mixtures (that when in contact with water) emit flammable gases Organic peroxides
	Gas Cylinder	Gases under pressure - Compressed gases - Liquefied gases - Refrigerated liquefied gases
	Exploding Bomb	Unstable explosives Explosives of Divisions that include self-reactive substances & mixtures Organic peroxides

3.5 COSHH Risk Assessment

A general generic risk assessment must highlight hazards and risks identified in the working area. Where COSHH substances have been identified as being in use, then a COSHH risk assessment must be completed.

Hotel Services have already identified all approved substances /chemicals they have in use. Details of these can be found on the InTouch pages here:

- [Hotel Services COSHH Assessments](#)

3.6 Monitoring and Health Surveillance

Monitoring

If through the risk assessment process it is identified that staff are potentially at risk from exposure to substances hazardous to health, then monitoring of staff groups will be implemented. This will include staff groups undertaking identical or similar tasks and being exposed to similar risks.

Monitoring will be carried out by trained and experienced staff in monitoring exposure and be:

- Familiar with monitoring standard methods
- Adequate knowledge of exposure limits and exposure strategies
- Writing professional development
- Provide sensible and proportionate advice

Monitoring records will contain the following information:

- Traceability information including name of substance (CAS number and Work Exposure Limits (WELs), if applicable)
- Process/task description
- Date of monitoring undertaken
- Report authors name

Health Surveillance

The objective of health surveillance is to:

- Check the health of individuals by detecting, as early as possible adverse changes which may be caused by exposure to substances hazardous to health.
- Collect, keep up to date data, and use data to evaluate hazards so that action can be taken to prevent more serious diseases developing.
- Check control measures are working effectively and provide feedback on the effectiveness of the risk assessments and control measures, whether further steps to manage the risk are required.

Where health surveillance shows an employee's health is being affected the following steps will be implemented:

- Review of the risk assessment, if necessary modify control measures
- Check health of employees doing similar work
- Refer employer to Occupational Health who will explain:
 - Results of health surveillance
 - Arrange for further specialist assessment of health
 - Continue with health surveillance
 - Consideration of alternative employment within workplace

4 Definitions

Term	Definition
COSHH	<ul style="list-style-type: none"> Control of Substances Hazardous to Health Substances that are hazardous to health which can take many forms.
Significant Risk	Risks which are significant are those that are not trivial in nature and capable of creating a real risk to health and safety which any reasonable person would appreciate and take steps to guard against
Safety Data Sheet (SDS)	Document that summarises the performance and other technical characteristics of a product which contains information to assist with undertaking a risk assessment.

5 How this Procedure will be Implemented

- This procedure will be published on the Trust's intranet and external website.
- Line managers will disseminate this procedure to all Trust employees through a line management briefing.

5.1 Training Needs Analysis

Staff / Professional Group	Type of Training	Duration	Frequency of Training
Hotel Services	Local Induction	varies	On Induction and updates when assessments are reviewed
Estates	Local Induction	varies	On local induction and on introduction of new substances and processes
Nursing Staff	Local Induction	varies	On local induction and on introduction of new substances and processes

6 How the Implementation of this Procedure will be Monitored

Auditable Standard/Key Performance Indicators		Frequency/Method/Person Responsible	Where results and any Associate Action Plan will be reported to, implemented and monitored; (this will usually be via the relevant Governance Group)
1	Completed risk assessments	Audit Programme	HSS+F Group

7 References

- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002
- Personal Protective Equipment at Work Regulations 1992 (as amended 2002)
- Working with Substances Hazardous to Health – A brief guide to COSHH
- The Control of Substances Hazardous to Health Regulations 2002. Approved Code of Practice and guidance; L5

8 Document Control

Date of approval:	13 February 2020	
Next review date:	13 August 2023	
This document replaces:	Ref: HS-0001-013.v1 Control of Substances Hazardous to Health (COSHH) Procedure	
Lead:	Name	Title
	Helen Cunningham	Health & Safety Manager
Members of working party:	Name	Title
		Health, Safety Security & Fire Group
This document has been agreed and accepted by: (Director)	Name	Title
	Paul Foxtton	Director of Capital, Estates and Facilities Management
This document was approved by:	Name of committee/group	Date
	EFM DMT	13 February 2020
An equality analysis was completed on this document on:	July 2019	

Change record










Version	Date	Amendment details	Status
1	08 May 2015	New document	Withdrawn
1	08 Sep 2016	Full review – no changes required	Withdrawn
1	26 Sep 2019	Review date extended from 08 September 2019 to 31 March 2019	Withdrawn
2	13 Feb 2020	Full Review: P9: 3.5 COSHH Risk assessment with link to InTouch pages added P10: 4 Definitions: Safety Data Sheets added P10: 5 Training Needs Analysis added P13: Appendix 1 COSHH Risk Assessment Format & Appendix 2 Example Completed COSHH Assessment P12: Section 9 - Appendices / Update COSHH Assessment Form	Published
	July 2020	Review date extended by 6 months	

9 Appendices

[Appendix 1 – COSHH Assessment \(Blank\)](#)







[Appendix 2 – Example Completed COSHH Assessment](#)

9.1 Appendix 1

Control of Substances Hazardous to Health (COSHH) Assessment								
SECTION 1								
Assessment Number:								
Assessment Completed By:					Signature:			
Department:					Job Role:			
Date Assessment Conducted:					Review Date:			
Substance(s) Used / Present:						[image]		
								
Toxic	Irritant / Harmful	Corrosive	Flammable	Oxidising	Explosive	Dangerous to Environment	Gases Under Pressure	Health Hazard
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>











Activity / Process: <i>(including area of activity)</i>					
Amount Used:	Duration:			State:	Solid <input type="checkbox"/>
	Frequency:				Liquid <input type="checkbox"/>
			Gas <input type="checkbox"/>		
People at Risk:	Staff <input type="checkbox"/>	Public <input type="checkbox"/>	Risk of Exposure:	Low <input type="checkbox"/>	
	Patients <input type="checkbox"/>	Others <input type="checkbox"/>		Medium <input type="checkbox"/>	
Contractors <input type="checkbox"/>	_____			High <input type="checkbox"/>	
By-Products Produced:	Dusts <input type="checkbox"/>		Fumes <input type="checkbox"/>		
	Vapour <input type="checkbox"/>		Other Breakdown Products <input type="checkbox"/>		

SECTION 2 – Hazards & Control Measures	
Routes of Exposure:	Absorption / Skin Contact <input type="checkbox"/> Inhalation <input type="checkbox"/> Eye Contact <input type="checkbox"/> Injection <input type="checkbox"/> Ingestion <input type="checkbox"/>
Control Measures	Re-design <input type="checkbox"/> Maintenance Controls <input type="checkbox"/> Substitution <input type="checkbox"/> Workplace Monitoring <input type="checkbox"/> Engineering <input type="checkbox"/> PPE <input type="checkbox"/> Local Exhaust Ventilation <input type="checkbox"/> Other: _____

Personal Protective Equipment (PPE)	Full Face Visor  <input type="checkbox"/>	Face Mask  <input type="checkbox"/>
	Goggles / Safety Glasses  <input type="checkbox"/>	Gloves / Gauntlets (Chemical Resistant)  <input type="checkbox"/>
	Respirator  <input type="checkbox"/>	Protective Clothing  <input type="checkbox"/>
Maintenance Control Measures Identified:		
First Aid Provisions:	Inhalation	
	Ingestion	
	Absorption	
	Eye Contact	
	Other / Site Specific:	
Fire & Emergency Provisions:		
Spillage Measures:		
Information, Instruction & Training:		
Handling & Storage:		
Disposal Procedures:		
Has risk been adequately controlled after control measures have been implemented?	YES <input type="checkbox"/> NO <input type="checkbox"/>	







<p style="text-align: center;">If no what further action is required?</p>	
<p>Risk Group: <i>(After controls in place)</i> <i>Please refer to guidance in Risk Management File</i></p>	

9.2 Appendix 2

Control of Substances Hazardous to Health (COSHH) Assessment – EXAMPLE									
SECTION 1									
						Assessment Number:	COSHH 001		
Assessment Completed By:						Signature:			
Department:	Hotel Services					Job Role:			
Date Assessment Conducted:	January 2020					Review Date:	January 2021		
Substance(s) Used / Present:	SPOTLESS – RINSE AID FOR DISHWASHERS								
									
Toxic	Irritant / Harmful	Corrosive	Flammable	Oxidising	Explosive	Dangerous to Environment	Gases Under Pressure	Health Hazard	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Activity / Process: <i>(including area of activity)</i>	Used in cleaning of utensils, crockery, cutlery etc. Supplied in 5 litre containers When replacing empty container, unscrew cap, insert tube from machine, screw back on cap, container placed on floor/bracket next to machine.		
Amount Used:	Electronically regulated by machine.		State: Solid <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> Gas <input type="checkbox"/>
	Duration:	Varies	
	Frequency:	Daily	
People at Risk:	Staff <input checked="" type="checkbox"/> Patients <input type="checkbox"/> Contractors <input type="checkbox"/>	Public <input type="checkbox"/> Others <input type="checkbox"/>	Risk of Exposure: Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High <input type="checkbox"/>
	Catering Staff & Housekeeper		
By-Products Produced:	Dusts <input type="checkbox"/>		Fumes <input type="checkbox"/>
	Vapour <input type="checkbox"/>		Other Breakdown Products <input type="checkbox"/>

SECTION 2 – Hazards & Control Measures	
Routes of Exposure:	Absorption / Skin Contact <input type="checkbox"/> Eye Contact <input checked="" type="checkbox"/> Ingestion <input checked="" type="checkbox"/> Inhalation <input type="checkbox"/> Injection <input type="checkbox"/>

Control Measures	Re-design <input type="checkbox"/>		Maintenance Controls <input type="checkbox"/>	
	Substitution <input type="checkbox"/>		Workplace Monitoring <input type="checkbox"/>	
	Engineering <input type="checkbox"/>		PPE <input checked="" type="checkbox"/>	
	Local Exhaust Ventilation <input type="checkbox"/>		Other: _____	
Personal Protective Equipment (PPE)	Full Face Visor  <input type="checkbox"/>		Face Mask  <input type="checkbox"/>	
	Goggles / Safety Glasses  <input checked="" type="checkbox"/>		Gloves / Gauntlets (Chemical Resistant)  <input checked="" type="checkbox"/>	
	Respirator  <input type="checkbox"/>		Protective Clothing  <input checked="" type="checkbox"/>	
Maintenance Control Measures Identified:				
First Aid Provisions:	Inhalation	Remove to fresh air		
	Ingestion	Seek medical attention. Take Safety Data Sheet.		
	Absorption	Wash with soap and water.		
	Eye Contact	Rinse with running water for 10 minutes.		
	Other / Site Specific:			
Fire & Emergency Provisions:	Fire: normal fire procedures in place			
Spillage Measures:	Small quantities: clean with cold water Large quantities: prevent from entering main drains – contact estates department			

Information, Instruction & Training:	Wear PPE Refer to following documents: <ul style="list-style-type: none"> • Work Schedules • General Risk Assessments • Product Safety Data Sheet
Handling & Storage:	Store away from heat
Disposal Procedures:	Containers can be disposed of with general waste
Has risk been adequately controlled after control measures have been implemented?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If no what further action is required?	
Risk Group: <i>(After controls in place)</i> <i>Please refer to guidance in Risk Management File</i>	

Equality Analysis Screening Form

Please note; The Equality Analysis Policy and Equality Analysis Guidance can be found on InTouch on the policies page

Name of Service area, Directorate/Department i.e. substance misuse, corporate, finance etc.	Estates & Facilities Management, Health Safety & Security			
Name of responsible person and job title	Helen Cunningham			
Name of working party, to include any other individuals, agencies or groups involved in this analysis	Health, Safety Security & Fire Group			
Policy (document/service) name	Control of Substances Hazardous to Health (COSHH) Procedure			
Is the area being assessed a...	Policy/Strategy	<input type="checkbox"/>	Service/Business plan	<input type="checkbox"/>
	Procedure/Guidance	<input checked="" type="checkbox"/>	Code of practice	<input type="checkbox"/>
	Other – Please state			
Geographical area covered	Trustwide			
Aims and objectives	Following this procedure will assist with identifying and managing substances which have been identified as hazardous to health.			
Start date of Equality Analysis Screening (This is the date you are asked to write or review the document/service etc.)	Jan 2019			
End date of Equality Analysis Screening (This is when you have completed the equality analysis and it is ready to go to EMT to be approved)	July 2019			

You must contact the EDHR team if you identify a negative impact. Please ring Sarah Jay or Julie Barfoot on 0191 3336267/3046

1. Who does the Policy, Service, Function, Strategy, Code of practice, Guidance, Project or Business plan benefit?					
All staff, patients and visitors					
2. Will the Policy, Service, Function, Strategy, Code of practice, Guidance, Project or Business plan impact negatively on any of the protected characteristic groups below?					
Race (including Gypsy and Traveller)	No	Disability (includes physical, learning, mental health, sensory and medical disabilities)	No	Sex (Men, women and gender neutral etc.)	No
Gender reassignment (Transgender and gender identity)	No	Sexual Orientation (Lesbian, Gay, Bisexual and Heterosexual etc.)	No	Age (includes, young people, older people – people of all ages)	No
Religion or Belief (includes faith groups, atheism and philosophical belief's)	No	Pregnancy and Maternity (includes pregnancy, women who are breastfeeding and women on maternity leave)	Yes	Marriage and Civil Partnership (includes opposite and same sex couples who are married or civil partners)	No
<p>Yes – Please describe anticipated negative impact/s</p> <p>No – Please describe any positive impacts/s</p> <p>Some identified substances may be a risk to new and expectant mothers and their unborn baby and therefore must be reviewed through risk assessment.</p>					

3. Have you considered other sources of information such as; legislation, codes of practice, best practice, nice guidelines, CQC reports or feedback etc.? If 'No', why not?	Yes	X	No	
Sources of Information may include: <ul style="list-style-type: none"> • Feedback from equality bodies, Care Quality Commission, Equality and Human Rights Commission, etc. • Investigation findings • Safety Alerts • Trust Strategic Direction • Data collection/analysis • National Guidance/Reports 	X X	<ul style="list-style-type: none"> • Staff grievances • Media • Community Consultation/Consultation Groups • Internal Consultation • Research • Other (Please state below) 		
4. Have you engaged or consulted with service users, carers, staff and other stakeholders including people from the following protected groups?: Race, Disability, Sex, Gender reassignment (Trans), Sexual Orientation (LGB), Religion or Belief, Age, Pregnancy and Maternity or Marriage and Civil Partnership				
Yes – Please describe the engagement and involvement that has taken place				
Staff engagement and consultation through Health, Safety, Security & Fire Group				
No – Please describe future plans that you may have to engage and involve people from different groups				

5. As part of this equality analysis have any training needs/service needs been identified?					
Training to be provided through local induction and supervision.					
Yes/No	Please describe the identified training needs/service needs below:				
A training need has been identified for;					
Trust staff	Yes	Service users	Yes/No	Contractors or other outside agencies	Yes/No
Make sure that you have checked the information and that you are comfortable that additional evidence can provided if you are required to do so					
The completed EA has been signed off by: You the Policy owner/manager: Type name: Helen Cunningham					Date: July 2019
Your reporting (line) manager: Type name: Linda Parsons					Date: July 2019
If you need further advice or information on equality analysis, the EDHR team host surgeries to support you in this process, to book on and find out more please call: 0191 3336267/3046					