



## 025: Control of Substances Hazardous to Health (COSHH) Policy and Process

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## **INTRODUCTION**

The purpose of the Control of Substances Hazardous to Health Regulations (COSHH) 2002 is to protect workers from harm arising from substances used at their normal place of work or work process.

NHS 24 recognises the responsibility placed upon it by the Control of Substances Hazardous to Health Regulations 2002 and will take all steps that are reasonable and practical in order to comply with the requirements of those regulations.

This policy and accompanying NHS 24 COSHH procedures are based on the requirements of the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 as amended. The legislation applies to all people at work and other persons affected by such work.

## **SUBSTANCES HAZARDOUS TO HEALTH**

COSHH 2002 applies to a very wide range of substances and preparations, mixtures of two or more substances-with the potential to cause harm if they are inhaled, ingested or come into contact with or are absorbed through the skin. These include individual chemical substances or preparations such as paints, cleaning materials, metals, pesticides and insecticides. There can also be biological agents such as pathogens or cell cultures. Substances hazardous to health can occur in many forms, e.g. solids, liquids, vapours, gases, dusts, fibres, fumes, mist and smoke.

## **OBJECTIVE**

NHS 24, so far as is reasonable and practical, will:

- Identify and record all substances normally used, stored or transported
- Assess the presented by those substances and take all reasonable and practical steps to eliminate or minimise these risk.
- Where the risk cannot be eliminated, ensure that procedures or protective equipment exists to prevent or control exposure.
- Ensure that control measures are monitored and where appropriate tested.
- Make available to all staff information relating to the control and safety of those substances normally used, stored or transported.
- Ensure that all members of staff receive appropriate instruction and training.
- Ensure that no contractor will use or store any substance on premises owned or operated by the NHS 24, without first declaring the substance, producing a Material Safety Data Sheet, (MSDS) and obtaining permission from the appropriate manager.
- Ensure that any substances, with the exception of food and beverages, retained by staff for their own use e.g. toiletries: will be secured within their personal locker when not in use.

## **RESPONSIBILITIES**

**Chief Executive**

The Chief Executive has overall accountability for the management of health and safety and will delegate responsibility to ensure that adequate and appropriate resources are made available to ensure that the NHS 24 meets its statutory obligations noted in this Policy.

**Head of Service/Department Managers**

Are responsible for ensuring that the NHS 24 procedures, policies and process are complied with.

Ensure that employees working in NHS 24 receive adequate information, instruction and training on hazardous

Ensure that substances used by employees are only those supplied by the NHS 24.

Ensure that employees wear any PPE that is provided in relation to working with a hazardous substance.

Ensure that employees report any untoward incidents, such as accidents or ill health, involving exposure to a hazardous substance.

**Head of HR Business Services**

Is responsible for:

- Ensuring that any procedures for complying with COSHH Regulations 2002 and any regulations affected by COSHH are in place.
- Ensuring senior managers are aware of their legal obligations under COSHH.
- Ensuring the Health and Safety Management system is in place and allows NHS 24 to comply with existing COSHH legislation.

**Health and Safety Consultant**

Is responsible for:

- Advising the senior management team of any forthcoming legislation which may affect NHS 24.
- Proposing procedural changes to allow NHS 24 to comply with new Health and Safety law prior to its implementation.
- Ensuring that all divisions and departments are appropriately audited.
- Ensuring competent persons are appointed to carry out Risk Assessments of the exposure to substances hazardous to health and over see the COSHH register for product review and substance changes as they occur .
- Ensuring All COSHH products are reviewed every 2 years or earlier if the product is changed or substituted.

## **Service Support Teams**

Are responsible for ongoing monitoring of this policy, ensuring that risk assessments are undertaken and updates issued to the COSHH register on the Rivo system.

## **MANAGEMENT RESPONSIBILITY**

- NHS 24 recognises its responsibility in ensuring that employees are not intentionally exposed to hazardous substances.
- NHS 24 also aims to ensure that any hazardous substances used in its activities present the lowest practicable risk to the health, safety and welfare of its staff.
- To ensure all substance receptacles are correctly and clearly identified.
- Ensure that substances used by employees are only those supplied by NHS 24
- Where substance risk cannot be eliminated, substituted or controlled, suitable Personal Protective Equipment (PPE) will be provided, and training on its use where necessary.
- To provide information, instruction and training where required to employees and others who may be affected.
- Identify (by signage) areas of significant risk so that visitors (in particular other emergency services) and contractors are aware of any substances on the premises that offer significant risk to health.
- To liaise closely with any contractor required to undertake work on NHS 24 premises and the work requires use of a substance affected by COSHH 2002, so to ensure that any safety measures or safe systems of work are brought to the attention of staff.
- Liaise with the Risk and Health and Safety team and Occupational Health where any employee has suffered ill-health, or may require health surveillance, from exposure to hazardous substance. This is particularly important where the employee is a new or expectant mother.

**Employees** have a responsibility to:

- Ensure that they familiarise themselves with any risk assessments, material safety data sheets or other information relating to hazardous substance within their workplace.
- Ensure that they have received adequate information and/or training in the use of hazardous substances and in the case of emergency staff, contact with potentially hazardous substances in the emergency setting.
- Use any Personal Protective Equipment (PPE) that has been provided for use when working with a hazardous substance.
- Report any incident involving a substance hazardous to health. They must report any illness suspected of being related to exposure to a substance at work and

should co operate with any health surveillance programme established to monitor their health.

## **PURCHASING PROCEDURES**

All purchases of goods and substances must be undertaken in accordance with NHS 24 recognised and agreed procedures. No other purchasing approaches should be adopted.

Manufacturers and suppliers of substances and materials have a legal duty to supply material safety data sheets for the materials provided. All purchases/ requisitions should include a request to supply material safety data information sheets.

The Procurement manager will liaise with the Health and Safety Consultant to ensure that all substances labelled, 'hazardous to health' are risk assessed prior to purchase.

The Procurement team will continue to actively seek to provide suitable alternatives which pose less risk to health and/or the environment.

## **MATERIAL SAFETY DATA SHEETS (MSDS)**

In many circumstances reading the supplier's material safety data sheet will be enough to decide whether existing practices are sufficient to ensure adequate control of exposure. In other circumstances, in particular for new activities, it may be necessary to read HSE guidance notes, manufactures standards, technical papers, trade literature etc to estimate the likely exposure before deciding what control measures should be applied.

Managers must ensure that substances are not taken into use until such time as data sheets are obtained and COSHH assessments have been carried out. Suppliers have a legal obligation to supply these sheets under the Chemicals Hazard information and Packaging for Supply Regulations 1994;

## **DEFINITIONS**

"Substance" means any natural or artificial substance whether in solid or liquid form, or in the form of gas, dust or vapour.

"Substances hazardous to health" are defined as:

- A substance which has as Maximum Exposure Limit, or for which the Health and Safety Executive has approved an Occupational Exposure Limit.
- A Biological Agent.
- Dust of any kind when present at a substantial concentration in the air.

"Biological Agent" means 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.

"Carcinogen" means any substance, or preparation, which is classified as being carcinogenic.

## RISK ASSESSMENT

Assessing the risk involves making a judgment on how likely it is that the hazardous substance will affect the health of the person using or coming into contact with it.

Competent persons are appointed by NHS 24 to carry out risk assessments of the exposure to substances hazardous to health.

Competent persons include members of Health and Safety Leads, Health and Safety Consultant, and Occupational Health professionals.

All operations that involve, or may involve, exposure to a hazardous substance will be assessed. Where elimination or substitution of the hazardous substance is not possible then appropriate measures will be taken to reduce or control the risk.

Advice will be sought from Occupational Health as to any specific precautions or health surveillance that may be required.

Risk assessments will be documented using the RIVO Safeguard COSHH Risk Assessment template.

Completed risk assessments and material safety data sheets will be circulated in the COSHH File on the NHS 24 Intranet site, so accessible to all staff.

Risk assessments must be reviewed every 2 years or sooner if:

- There has been a significant change in the workplace.
- There has been a significant change in the use of a substance.
- Where the risk is no longer valid.

## Revision History

Version	Date	Status	Author	Remarks
1	January 2014	New - Final	F McNicol	New policy introduced
2	December 2016	Reviewed Final	F McNicol	Reviewed – added new responsibility for H&S Consultant – to oversee COSHH register.
2.1	September 2019	Reviewed Final	F McNicol	Reviewed no significant changes

## Appendix A

### KNOW YOUR SYMBOLS







#### COSHH – Know your warning symbols










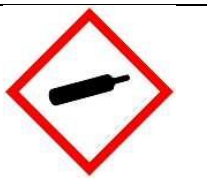
Under COSHH or the Control of Substances Hazardous to Health Regulations 2002, all persons at work need to know the safety precautions to take so as not to endanger themselves or others through exposure to substances hazardous to health.

International symbols will replace the European symbols in 2009. Some of them are similar to the European symbols but there is no single word describing the hazard. The most noticeable feature is the change in the labelling symbols: instead of the hazard symbols with black printing on orange-yellow rectangles that have been used to date, now nine hazard pictograms with black symbols on a white background with red-rimmed rhombuses are used to provide warnings

The new international hazard symbols and warning and precautionary phrases will be used on labels which will eventually replace the danger signs, risk and safety phrases. There will be a transitional period as these are gradually phased in. The changes have to be completed by Dec 2010 for substances and by December 2015 for preparations. The long transition period for the labelling systems (2009 - 2015) is intended to ensure that all of the relevant parties - public authorities, companies and stakeholders - are able to concentrate their resources on the new obligations in a timely manner.

The table in Appendix A shows the main categories of the new CLP pictograms and the current Hazard Symbols which they are replacing.

Old CHIP Symbol	Current Symbol	Hazard Class
		Hazardous to the aquatic environment
 Harmful/Irritant		Acute Toxicity (Cat 4) Skin and eye irritation Skin sensitisation specific target organ toxicity Respiratory tract irritation Narcotic effects
 No current specific symbol use either		Respiratory sensitisation Germ cell mutagenicity Carcinogenicity Reproductive toxicity Specific target organ toxicity Aspiration hazard

 <p>Toxic</p>	 <p>Harmful toxic</p>		<p>Acute toxicity (Cat1-3)</p>
 <p>Highly /Extremely flammable</p>		<p>Flammable gases, aerosols, liquids or solids                  Self reactive substances and mixtures                  Pyrophoric liquids and solids                  Self –heating substances and mixtures                  Substances and mixtures which in contact with water emit flammable gases                  Organic peroxides</p>	
 <p>Corrosive</p>		<p>Corrosive to metals                  Skin corrosion                  Severe eye damage</p>	
 <p>Explosive</p>		<p>Explosives                  Self –reactive substances and mixtures, types A,B organic peroxides , types A.B.</p>	
<p>No Current symbol</p>		<p>Gases under pressure                  Example - Contains gas under pressure; may explode when heated</p>	