



**COSHH (Control of Substances Hazardous to Health) Procedure**

**Printed copies must not be considered the definitive version**

<b>DOCUMENT CONTROL</b>		<b>PROCEDURE NO.</b>	H&S 03
<b>Procedure Group</b>	Occupational Health and Safety		
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## 1. Purpose and Scope

This procedure document is provided to assist and enable staff in complying with the Control of Substances Hazardous to Health (COSHH) Regulations 2002.

The COSHH Regulations are designed to help protect staff and others against risks to their health and well-being in the workplace. They apply to hazardous substances which arise in connection with work under our control or carried out on our behalf. The substances can be solid, liquid, gas, fume, dust, vapour or even micro-organisms and can endanger health by being absorbed or injected through the skin or mucous membranes, inhaled or ingested.

## 2. Procedure Aims

We will, so far as is reasonably practicable, prevent exposure to harmful substances and where this is not reasonably practicable ensure exposure is limited to as low as reasonably practicable (ALARP).

## 3. Responsibilities and Organisational Arrangements.

### The Chief Executive is responsible for:

- making sure that where appropriate there are arrangements for identifying, evaluating and managing risk associated with COSHH;
- providing resources for putting the procedure into practice; and
- making sure that there are arrangements for monitoring incidents linked to COSHH and that the Board regularly reviews the effectiveness of the procedure.

### Senior and Line Managers are responsible for:

- making sure that all staff are aware of the procedure;
- making sure that risk assessments are carried out and reviewed regularly;
- putting procedures and safe systems of work into practice which are designed to eliminate or reduce the risks associated with hazardous substances;
- making sure that staff groups and individuals identified as being at risk are given appropriate information, instruction and training, including training at induction, updates and refresher training as necessary;
- managing the effectiveness of preventative measures through an effective system of reporting, investigating and recording incidents;
- making sure that control measures are used, that equipment is properly maintained and procedures observed;
- monitoring the exposure of the workers and where risk assessment indicates arranging appropriate forms of health surveillance.

All **staff** are responsible for:

- taking reasonable care of themselves and other people who may be affected by their acts or omissions;
- co-operating by following rules and procedures designed for safe working;
- reporting all incidents that may affect the health and safety of themselves or others and asking for guidance as appropriate;
- taking part in training designed to meet the requirements of the procedure; and
- reporting any dangers they identify or any concerns they might have in respect of working with harmful substances.

**Occupational Health is responsible for:**

-Providing training in COSHH Risk Assessment to managers and delegated employees.

-Providing health surveillance at the request of managers and maintaining accurate records and recall systems via Opas.

-Assessing staff that may have health conditions related to hazardous substances and providing recommendations in relation to rehabilitation and accommodations as necessary.

Where chronic conditions persist indefinite redeployment within the organisation may be necessary. This will be discussed and agreed with Occupational Health, Staff Side Representatives, Human Resources, management and the individual staff member in accordance with NHS Dumfries and Galloway's Redeployment Procedure

#### **4. Monitoring**

Monitoring of COSHH related health issues will be via the Occupational Health Referral Process (Opas Outcomes and Health Surveillance), the **InPhase** recording system and RIDDOR data. Local statistics will be reviewed annually to monitor the effectiveness of this procedure and associated procedures.

## 5. Equality and Diversity

An impact assessment has been completed.

The procedure aims are to prevent problems occurring, but where COSHH issues occur then early treatment and resolution are the aim. However where chronic conditions persist recommendations in relation to rehabilitation and accommodations may be necessary and this may involve possible restrictions and/or alternative working/redeployment.

## 6. Document Control Sheet

### DOCUMENT CONTROL SHEET

#### 1. Document Status

<b>Article I.</b>	<b>Title</b>	<b>COSHH (Control of substances Hazardous to Health)</b>
<b>Author</b>		Lewis Howat
<b>Approver</b>		Andy Howat
<b>Version number</b>		3 of new procedure

#### 2 Document Amendment History

<b>Version</b>	<b>Section(s)</b>	<b>Reason for update</b>
1.1		
3		Review of procedure and legislation updates
4		Review with reference to Fit Mask Testing Procedure

#### 3. Distribution

<b>Name</b>	<b>Responsibility</b>	<b>Version number</b>
<b>Corporate Procedure Register</b>	<b>Laura Geddes</b>	<b>3</b>
<b>Intranet</b>	<b>Laura Geddes</b>	<b>3</b>
<b>O.H. and Safety Page</b>	<b>Andy Howat &amp; Elaine Simpson</b>	<b>3</b>

Title: COSHH  
Author: Lewis Howat  
Version: 4  
Approved: July 2025

The only current version of this procedure is on the intranet

#### 4. Associated documents

- Control of Substances Hazardous to Health (COSHH) Regulations 2002 - Control of substances hazardous to health (COSHH). The Control of Substances Hazardous to Health Regulations 2002 (as amended). Approved Code of Practice and guidance L5 (hse.gov.uk)
- EH40/2005 Workplace Exposure Limits - EH40/2005 Workplace exposure limits (hse.gov.uk)
- HSE Guidance Note MS 24 (1998) - Medical aspects of occupational skin disease - MS24 (hse.gov.uk)
- Guidance on respiratory protective equipment (RPE) fit testing – INDG479 - Guidance on respiratory protective equipment (RPE) fit testing - INDG479 (hse.gov.uk)
- NHS Dumfries and Galloway 'Face Mask Fit Test Plus Programme: Renewal Plan'.

#### 3. Action Plan for Implementation

Action	Lead Officer	Timeframe
To alert all NHS D&G Staff to this review Procedure Document	Lewis Howat	May 2024

## Appendix 1 COSHH Risk Assessment guidance

### What is a 'substance hazardous to health'?

COSHH covers substances that are hazardous to health. Substances can take many forms and include:

- **chemicals**
- **products containing chemicals**
- **fumes**
- **dusts**
- **vapours**
- **mists**
- **nanotechnology**
- **gases and asphyxiating gases** and
- **biological agents** (blood and body fluids, bacteria)
- **Any substance that has a Work place Exposure Limit (WEL)**

**If the packaging has any of the HAZARD SYMBOLS then it is classed as a hazardous substance if you are unsure check the COSHH data sheet**

#### ***Section 1.01 COSHH does not cover***

- lead,
- asbestos or
- radioactive substances
- Medicines given to patients

The above hazardous substances have their own specific regulations.

#### ***Section 1.02 What is 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 ingestion.

### **Prevention and control**

Heads of department must make sure that staff members are not exposed to dangerous substances or, if that is not reasonably practicable, that they are reasonably controlled. Adequate control will be achieved by the organisation meeting the following criteria.

- If the level of exposure of a substance which could be inhaled and has a WEL is reduced as far as is reasonably practicable (and in any case below that WEL)

- Employers should control exposure to any substance which can be dangerous if swallowed, absorbed through the skin or mucous membranes or which comes into contact with the skin or mucous membranes (chemical burns, dermatitis and microbial infection) to a standard where most of the population could be exposed repeatedly to it without any effect on their health.
- Employers should always prevent exposure to carcinogens if this is reasonably practicable, or must at least control it to as low a level as is reasonably practicable.

## **Preventing Exposure**

Measures that we can consider for controlling exposure include the following hierarchy of controls:

- 1 Elimination of the use of the substance
- 2 Substitution by a less hazardous substance or by the same substance in a less hazardous form

## **Controlling Exposure by:**

- 1 Totally enclose process and handling systems
- 2 Partial enclosure with local exhaust ventilation
3. Sufficient general ventilation
- 4 Reduce exposure e.g. reduce frequency or quantity of chemical use or numbers of staff exposed i.e. job rotation
- 5 Introduce safe systems of work – procedures to follow, training, education and supervision
- 6 Provide suitable Personal Protective Equipment

### **IX 8.A**

We will, so far as is reasonably practicable, prevent exposure in ways other than just providing PPE except to a carcinogen or a biological agent where PPE will be additional to engineering and procedural controls.

We will always introduce process, engineering, procedural and personal controls before PPE if this is reasonably practicable.

Where necessary we will provide suitable and sufficient training on the use of the above controls.

## **Assessments**

It is the responsibility of the head of department to make sure that an assessment is carried out for each process involving hazardous substances. Assessment should also be completed for substances released or produced as part of the process. An inventory of all substances that create a significant risk should be compiled for each department

### **(Appendix 1)**

Substances that pose a significant risk should be recorded on the organisational assessment form **(See Appendix 2)**. This must be initialled by the assessor and by the manager or head of department. Managers should keep a copy of the assessment form in their department (electronic, on **InPhase** or paper). Managers must review the assessment if there is reason

to suspect it has become invalid or if there has been a significant change in the work previously assessed.

Before any new substance is introduced to a workplace within the organisation, the manager or competent COSHH assessor must carry out an assessment and make the appropriate additions and deletions to a department's inventory of hazardous substances.

**To complete a COSHH Assessment the following steps should be followed:**

**Step 1 - Assess the risks.** Assess the risks to health from hazardous substances used in or created by your workplace activities.

**Step 2 - Decide what precautions are needed.** You must not carry out work which could expose your employees to hazardous substances without first considering the risks and the necessary precautions, and what else you need to do to comply with COSHH.

**Step 3 - Prevent or adequately control exposure.** You must prevent your employees being exposed to Hazardous substances. Where preventing exposure is not reasonably practicable, then you must adequately control it. Managers can seek advice via Occupational Health and Safety and in other via the Health & Safety Executive (HSE), will help you to make correct assessments and to put the appropriate controls into place.

**Step 4 - Ensure that control measures are used and maintained.** Ensure that control measures are used and maintained properly and that safety procedures are followed.

**Step 5 - Monitor the exposure.** Monitor the exposure of employees to hazardous substances, if necessary. Contact Occupational Health and Safety for further advice.

**Step 6 - Carry out appropriate health surveillance.** Carry out appropriate health surveillance where your assessment has shown this is necessary or where COSHH sets specific requirements.

**Step 7 - Prepare plans and procedures to deal with accidents, incidents and emergencies.** Prepare plans and procedures to deal with accidents, incidents and emergencies involving hazardous substances, where necessary.

**Step 8 - Ensure employees are properly informed, trained and supervised.** You should provide your employees with suitable and sufficient information, instruction, training and supervision.

(COSHH Risk assessor training is available via the Occupational Health & Safety department).

In gathering information for an assessment, managers may need expert advice. More information is available from manufacturer's data sheets, from the substances database or the Occupational Health and Safety department. Adequate controls must include procedures for dealing with dangerous substances accidentally escaping. PPE equipment must keep to the requirements of the International Standards Organisation, British or European Standards if these exist. Eye protection must follow the requirements of the Personal Protective Equipment at Work Regulations 1992. To keep to the COSHH Regulations, RPE (Respiratory Protective Equipment) must be suitable for the purpose and be of the type approved by the Health and Safety Executive or keep to their approved standard.

## **Examining and testing control measures**

It is the responsibility of the head of department to make sure that all control measures are kept in efficient working order and in good repair. Procedures may vary from weekly visual checks to thorough servicing schedules. Employers should examine local exhaust ventilation plant thoroughly and test it at least once every 14 months. Where appropriate we must also examine respirators and breathing apparatus frequently. A record of each examination should be kept and this should be available for inspection for at least five years from the date on which it was made. Fit mask testing must take place as per NHS Dumfries and Galloway 'Face Mask Fit Test Plus Programme: Renewal Plan', with reference to guidance on respiratory protective equipment (RPE0 fit testing – INDG479

The organisation should provide enough information, instruction and training to allow staff to know the risks to health created by being exposed to hazardous substances and the precautions to be used, including decontamination, PPE and RPE.

## **Monitoring and reviewing**

For the purpose of the regulations, monitoring involves using valid and suitable techniques to estimate the airborne exposure of staff to hazardous substances. The head of department is responsible for making sure that this is being carried out by a competent person and that these activities are recorded.

Employers must keep records of any monitoring for 40 years if they record the personal exposure of identifiable staff. They should be kept for at least five years in all other cases.

Records should provide enough information to decide:

- when, where and under what conditions it took place;
- what monitoring procedures were used and how long they took; and
- whose exposure was monitored and what the results were.

## **Health Surveillance**

Health surveillance is appropriate when staff members are exposed to substances in circumstances where:

- an identifiable disease or negative health effect may be related to the exposure;
- there is a reasonable likelihood that the disease or negative effect may occur under the particular conditions of the work;
- valid techniques exist for detecting disease or effect.

This will involve the services of Occupational Health and Safety who will be responsible for maintaining health records and carrying out the appropriate examinations, immunisations and investigation. Clinical Directors or heads of departments must act on any medical decision to restrict a staff member's work with a specific substance.

Employers must keep staff health records for 40 years from the last date of entry. On receiving reasonable notice, any staff member must be allowed access to any health record which relates to them.

## **9 Informing staff**

The head of department must tell staff about the dangers and risks arising from their work, any precaution to be taken and, if carried out, the results of monitoring and the results of

health surveillance. They must also provide information and training in using controls and RPE and PPE correctly.



**(Appendix 2) COSHH Risk Assessment Form** (see also Beacon for online version)

<b>Location</b>		<b>Department</b>		<b>Manager</b>	
<b>(i) Operation/Activity</b>					<i>Complete the relevant details of the activity being assessed</i>
<b>a) Individuals or groups exposed</b>					<i>Highlight who is at risk, Include details of age and sex of those exposed if this is relevant, the maximum numbers exposed and the duration of any exposure. Are there any non-employees e.g. patients, visitors and contractors exposed?</i>
<b>Maximum numbers exposed</b>					
<b>Duration of exposure</b>					
<b>Substance</b>	<b>Quantity</b>	<b>Nature of hazard</b>	<b>WEL 15min or 8hr</b>	<b>Safety data sheet available</b>	<p>List all details of the hazardous substance(s) used in the appropriate columns.</p> <p>Name of the substance including the chemical name where known.</p> <p>Quantity used in the process.</p> <p>Nature of hazard should state whether the substance is Very toxic, toxic, corrosive, harmful or irritant etc.</p> <p>If the substance has a workplace exposure limit WEL, it should be entered here, together with the reference period.</p> <p>State whether a manufacturer's safety data sheet is available for the substance.</p>

<b>Comments on the hazards associated with the substances</b>	<p><i>List any health hazards associated with potential exposures to the substances used or generated in the operation or activity. Include details on whether the exposure is due to the nature of the substance e.g. vapour, aerosol, liquid, dust or solid. Similarly details on the most likely route of entry should be included e.g. Inhalation, ingestion, skin absorption, skin or eye contact or injection (via sharps) etc. Most of this information can usually be obtained from the safety data sheet.</i></p>

<b>Storage, transport, handling and use</b>	<p><i>Highlight any special circumstances relating to the safe method of storing, handling and using the substances. If there are any special requirements highlight them here.</i></p>
<b><u>Disposal</u></b>	<p><i>State how the substances or any excess or waste will be disposed of. If there are any special requirements due to the nature of the material, or if it should be treated as special waste, identify what procedures will be used for safe disposal.</i></p>

<b>Spillage/Emergency procedures</b>		<i>Brief details of how any spillages or emergencies would be dealt with should be included here. If there are well defined departmental policies and procedures in place they could be referred to here.</i>			
<b><u>Control measures</u></b>		<i>List control measures taken to reduce risks. Can any substances be eliminated, or substituted with a less hazardous one? Are there any physical controls such as enclosure, local exhaust ventilation and PPE etc? Do not forget to include other controls including safe working procedures, information, instruction and training. Include details of maintenance and test schedule for physical controls.</i>			
<b><u>Risk Rating</u></b> <i>Article II. Using information above, and the guidance from the <b>Hazard Identification and Risk Assessment</b> section, taking into account the control measures in position, decide the applicable <b>Severity and Likelihood</b>, and Calculate risk rating.</i>	<b><u>Likelihood</u></b> Rarely happens Unlikely to occur Possibly can occur Likely to occur Almost certain	<b><u>Severity</u></b> Negligible injury, illness, loss Minor injury, illness, loss Moderate injury, illness, loss Major Injury, illness or loss Extreme loss, fatality, disaster	<b><u>Rating</u></b> <b>R= L x S</b>		
<b><u>Calculate Rating</u></b> = Likelihood x Severity					
<b>Monitoring and health surveillance</b>			<i>If monitoring or health surveillance is required for any of the hazardous substances relating to this assessment specify how this is carried out.</i>		
<b><u>Date</u></b>					
<b><u>Initial</u></b>					

**Use a new box each time this assessment is reviewed**