Aneurin Bevan University Health Board

POLICY FOR THE CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

N.B. Staff should be discouraged from printing this document. This is to avoid the risk of out of date printed versions of the document. The Intranet should be referred to for the current version of the document.
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1. Executive Summary

The use of chemicals or other hazardous substances at work can put people’s health at risk. The Control of Substances Hazardous to Health Regulations 2002 (as amended), requires employers to control exposure to hazardous substances to prevent ill health. Employers and employees alike have general duties under health and safety legislation and the COSHH Regulations detail specific requirements.

Senior Managers/Clinicians in all areas of the Health Board are responsible for implementing this policy and ensuring their managers, in turn, make adequate arrangements to comply with this policy and the COSHH Regulations.

Complying with COSHH involves:

- Assessing the risks to health arising from work
- Deciding what precautions are needed
- Preventing or controlling exposure
- Ensuring that control measures are used and maintained
- If necessary, monitoring exposure and carrying out health surveillance
- If necessary, preparing emergency plans and procedures
- Ensuring employees are properly informed, trained and supervised

1.1. Purpose of Policy

To ensure that the risk of injury or ill health from the exposure to hazardous substances is reduced as far as is reasonably practicable.

The policy outlines the requirements and responsibilities of the Aneurin Bevan University Health Board and its employees in order to comply with the Control of Substances Hazardous to Health Regulations 2002 (as amended).

The policy details the general and specific legislative requirements and responsibilities expected from all staff.

1.2. Target Audience

All Aneurin Bevan University Health Board staff
1.3. Implementation

All areas of the Health Board must ensure the policy is implemented by:

- Undertaking risk assessments for all substances hazardous to health
- Ensuring staff are adequately trained
- Ensuring all COSHH Registers are kept up to date

2. Introduction

Many dangerous substances used in the workplace have resulted in tragic and often fatal consequences. Over the last century the number of dangerous substances used by the workforce has considerably increased, each with their own benefits to reducing the work effort, improving efficiency and improving the finished product. Regrettfully, they have brought into the workplace some very harmful side effects.

Legislation requires employers to assess the health risks to employees and implement health-orientated and risk preventative strategies.

The Control of Substances Hazardous to Health Regulations 2002 (as amended) are based upon established principles of good occupational hygiene practices. These require employers to make an assessment of the risks to health which arise from exposure to hazardous substances in the circumstances of their own particular workplace. As part of this assessment, employees must establish what measures are necessary to prevent or adequately control exposure to dangerous substances and what further precautions need to be taken to protect people’s health. These Regulations also refer to carcinogens and biological agents.

3. Policy Statement

The Aneurin Bevan University Health Board’s Health and Safety objective is to minimise the number of occupational accidents and incidents of ill health and ultimately to achieve an accident-free workplace. All employees will be provided with such equipment, information, training and supervision as is necessary to implement the Policy and achieve the stated objective.

Aneurin Bevan University Health Board believes that an excellent organisation is by definition, a safe and secure organisation. It therefore follows that caring for all personnel and minimising risks is inseparable from all other Aneurin Bevan University Health Board objectives. To achieve this, the Board accepts that assessment and safe systems of work for all materials and substances used by employees must be in place and
exposure to substances that are hazardous to health are prevented or adequately controlled.

4. **Main Safety Objectives**

To control the function of staff using or coming into contact with substances hazardous to health by:

- Carrying out suitable and sufficient assessments of health risks involving substances hazardous to health.
- Providing safety equipment; and having a prescribed procedure to safeguard the health, safety and welfare of all staff, patients and visitors and any others affected by the Board’s work.
- The audit and monitoring of safety equipment.

5 **Legal Requirements**

5.1 **Employers – General Duties under the Health and Safety at Work etc Act 1974 (HSWA)**

The general duty of an employer under the Health and Safety at Work etc Act 1974 applies generally to work involving the use of substances hazardous to health as it applied to other kinds of work. The act places a duty on every employer to ensure so far as is reasonably practicable, the health, safety and welfare at work of all its employees, moreover, all employers must:

- Make arrangements for ensuring, so far as is reasonably practicable, safety and absence of health risks in connection with the use, handling, storage and transport of articles and substances.
- Provide and maintain plant and systems of work that are, so far as is reasonably practicable, safe and free from health risks.
- Provide such information, instruction, training and supervision as is necessary to ensure so far as is reasonably practicable, the health and safety at work of their employees.

5.2 **Employers – Specific Legal Requirements – COSHH**

Under COSHH regulations employers have been given a range of specific duties as follows:
• To carry out and review a formal independent assessment of health risks created by work involving materials and substances hazardous to health of employees.
• To prevent/control exposure of employees to health risks, by considering elimination or substitution of a hazardous substance as the priority.
• To institute proper use of controls and personal protective equipment.
• To maintain, examine and test controls and keep records.
• To monitor workplace exposure of employees where necessary for adequate control of exposure to substances hazardous to health or otherwise to protect the health of the employee in accordance with suitable procedures.
• Provide health surveillance where it is appropriate for the protection of health of those employees who are or are liable to be exposed to a substance hazardous to health.
• Provide information, instruction, supervision and training regarding hazardous substances.
• To ensure that the contents of containers and pipes for substances hazardous to health used at work are clearly identifiable.
• To prepare procedures, provide information and establish warning systems to deal with an emergency.

5.3 Employees – General Duties HSWA.

By virtue of Section 7 of the HSWA, employees are under a duty to take reasonable care of their own and others’ safety when handling and using substances hazardous to health as well as during any other work activity. Employees must also co-operate with their employer so far as is necessary to enable the employer to comply with any statutory duty or requirement, e.g. by following safe systems of work and by using and/or wearing personal protective equipment.

5.4 Employees – Specific Legal Requirements - COSHH

The main duties are as follows:

• To make full and proper use of control measures and personal protective equipment.

• To report any defects.

• At the cost of the employer to present himself for medical examination where appropriate and give such information about their health as may be reasonably required.
6. Responsibilities

Responsibility for implementing this policy rests with the Senior Managers/Clinicians in each Health Board area who in turn charge each of their managers with making adequate arrangements to ensure so far as is reasonably practicable, that staff follow safe systems of work.

The policy incorporates the following with regard to the control of substances hazardous to health.

6.1 Risk Assessment

Senior Managers/Clinicians shall ensure that:

- No work is carried out that is liable to expose employees to substances hazardous to health unless a suitable and sufficient assessment in writing of those risks has been carried out and that the steps needed to meet the requirements of the COSHH Regulations are recorded.
- The assessment is reviewed if there is reason to suspect that the assessment is no longer valid or there has been a significant change in the work to which the assessment relates.
- Where a review indicates changes in the assessment area required, these changes will be made.

6.2 Prevention or Control of Exposure to Substances Hazardous to Health

Senior Mangers/Clinicians will ensure that

- Exposure of employees to substances hazardous to health is either prevented or where it is not reasonably practicable, it is adequately controlled.
- So far as is reasonably practicable or adequate, control is provided by measures other than the provision of personal protective equipment.
- The above will include biological agents and carcinogens.
- Whilst being sensitive as far as is practicable to the religious obligations of some staff, it is recognised that the wearing of personal protective equipment cannot be compromised. It is the responsibility of the employee to raise with their line manager any issues or concerns regarding the wearing of personal protective equipment (PPE).

6.3 The Use, Maintenance, Examination and Test Control Measures

Senior Mangers/Clinicians will ensure that
• Where control measures, personal protective equipment or other items or facility is provided that it is properly used or applied as the case may be and stored in a well defined place.
• Employees are aware that they have a duty to make full and proper use of any control measure, personal protective equipment, or other item or facility provided. If they discover any defect they must report to their manager.
• Control measures provided are efficiently maintained, are in an efficient state and in good working order.
• Engineering controls e.g. local exhaust ventilation are thoroughly examined and tested at least once every 14 months or sooner if required by the COSHH Regulations and that respiratory protective equipment other than disposable, is subjected to thorough inspection and if appropriate, tested at suitable intervals.
• A record of examinations and tests and a record of repairs carried out as a result of examinations and tests is kept for a minimum of 5 years from the date of the examination, test or repair.
• Records must be readily available for inspection.
• When the need has been identified for employees to wear respiratory equipment, it shall be tested to ensure it is fit for use.

7. Monitoring of performance

Senior Managers/Clinicians will ensure that

• The exposure of employees to hazardous substances will be suitably monitored at intervals where indicated by COSHH Regulations and the approved code of practice.
• A suitable record is kept of any monitoring and where that monitoring is of the personal exposure of an identifiable employee that a record will be kept for a minimum of 40 years and in every other case for a minimum of 5 years.
• Where the results of an assessment have shown it to be necessary, health surveillance is available to all Aneurin Bevan University Health Board employees from the Occupational Health Department. The Senior Manager/Clinician has a responsibility to provide the Occupational Health Department with the details of those employees who are exposed to a substance hazardous to health that requires Health Surveillance. Relevant records must be kept for a minimum of 40 years.

8. Training Records

Senior Managers/Clinicians shall ensure that staff who may be exposed to hazardous substances shall receive the following:
• They will be provided with suitable and sufficient information, instruction and training to know the risks to their health created by such exposure and the precautions which should be taken. Where applicable this will be in an accessible format and reasonable adjustment will be made to ensure disabled staff are not disadvantaged.

• The information mentioned above will include information on the results of any monitoring of exposure at the workplace and in particular, in the case of any substance allocated a Workplace Exposure Limit. Where that Workplace Exposure Limit has been exceeded, the employee or his representative will be informed forthwith.

• Information on the collective results of any health surveillance undertaken will be passed to employees who may be exposed to hazardous substances in a form calculated to prevent it from being identified as relating to any particular person.

• Any person, whether or not an employee who carries out any work in connection with the Board’s duties under these regulations has the necessary information.

• The above will include biological agents and carcinogens.

9. Reference Documents

• COSHH Regulations 2002, COSHH (amended) Regulations 2003, 2004 and 2009 and Approved Code of Practice

• Health, Safety and Welfare Regulations 1992

• EH40 – Occupational Exposure Limits

• Management of Health and Safety at Work Regulations 1999

10. Document Enquiries and Data Sheets

Any enquiries regarding these documents should be referred to:

Health and Safety Department
Occupational Health Department

Equality & Diversity

This policy has undergone equality impact assessment (EqIA) screening using the NHS Wales EqIA toolkit. Details of the screening are available from the policy owner.
APPENDIX 1

Aneurin Bevan University Health Board
Control of Substances Hazardous to Health (CoSHH)

COSHH ASSESSMENT REQUEST FORM (CARQ)
GUIDANCE ON COMPLETING THE FORM

HAZARD = source of potential harm or damage;

RISK = is a combination of two elements, likelihood of exposure to the hazardous substance and the severity of exposure to that substance.

The Management of Health and Safety at Work Regulations 1999 and The Control of Substances Hazardous to Health Regulations 2002 (as amended) places an absolute duty on the employer to carry out an assessment of the risks to the health and safety of their employees and others who could be affected.

This form is used to assess the potential hazard and risk of a substance. All sections of the form MUST be completed and returned to Health and Safety, Llanfrechfa Grange who will process the form and send it to Sypol. Sypol produce a working risk assessment for the substance and activity you have described.

More than one assessment may be required. You MUST consider how a substance is used and how exposure could occur e.g. you may purchase a very harmful substance in a concentrated form that requires dilution to working strength, an assessment would then be required for the concentrate and a separate assessment for using the diluted substance.

The Form takes the person requesting the assessment through a structured process, all sections of the form MUST be completed.

The completed form MUST be sent to the address above and the risk assessment will be returned to you after processing. It should then be kept in the CoSHH Register at the location where the work activity using the substance is carried out. A copy of the assessment must be available at all times and brought to the attention of all staff coming into contact with the substance.

CHECKLIST

• Ensure all sections of the form have the correct details
• Obtain copy of MSDS form the supplier if requested
• Return the completed CARQ to the address stated
• Health & Safety will process your form and send it to SYPOL
• SYPOL returns the completed Risk Assessment to Health & Safety as soon as possible
• Health & Safety will send the Risk Assessment to the person named on the original request form
• YOU must bring the Risk Assessment Form to the attention of relevant staff
• YOU must file the Risk Assessment Form safely in the Department
COMPLETING THE FORM

YOUR DETAILS
The person making the request should be the COSHH co-ordinator but this may not always be the case. Please ensure that all boxes are complete to ensure that we can contact you if an issue arises.

LOCATION DETAILS
The location is the area where the risk assessment applies e.g. Royal Gwent Hospital - Ward B4.
SUB WORK AREA CODE - This is the unique code for your place of work, it can be found printed on the top of your workplace CoSHH index, or the top of another CoSHH assessment for your work area.

MATERIAL DETAILS
ASSESSMENT CODE - If known please enter the assessment code for the assessment being requested.
TRADE NAME - Enter the name on the container label of the substance used.
PHYSICAL STATE – Tick to state whether the substance is in either a solid, liquid or gas form.
SUPPLIER / MANUFACTURER - It is important to include the name of the supplier of the substance. In order that an accurate Risk Assessment can be obtained, the supplier/manufacturer’s hazard data sheets are referred to, without this information the assessment may not be appropriate. You may later be asked to obtain a copy of the ‘Material Safety Data Sheet’ (MSDS) sheet from the supplier; they have a legal duty to provide this information.
PHONE NO - The contact number for the substance supplier, this is always stated on the substance packaging.

MATERIAL EXPOSURE INFORMATION
METHOD OF APPLICATION/EXPOSURE - How is the substance used i.e. hand applied, sprayed, laboratory work, injected etc.
AREA OF EXPOSURE - Under most circumstances the substance will be used inside the building either in a well ventilated area or a poorly ventilated area. Well ventilated would be in areas where there is a good circulation of fresh air or windows can be opened, whereas poorly ventilated area would be rooms without a free flow of air and windows that cannot be opened. Outside and confined spaces are most likely to affect Estates staff e.g. using paints outside, working in inspection chambers.
LENGTH OF TIME EXPOSED - This question is looking for the actual amount of time staff are exposed to the substance e.g. ASEP may be used for an endoscopy clinic lasting 4 hours but the actual exposure to ASEP may be ½-2 hours whilst handling it in the sterilising unit, a further example could be exposure to blood on a ward the actual exposure being generally less than ½ hour over any one shift.
QUANTITY OF MATERIAL USED IN ONE DAY - How much of the chemical is used in one day.
FREQUENCY OF USE - How often is the substance used i.e. daily, weekly, monthly, less often
NUMBER OF PEOPLE EXPOSED WITH THIS APPLICATION - How many people are directly exposed to the substance in relation to the work activity being carried out?

ARE SUSCEPTIBLE WORKERS EXPOSED - Would the following types of persons be exposed to the substance, elderly, children, pregnant women, disabled persons.

ARE OTHER PEOPLE EXPOSED - If other people are exposed to the substance please state who and the number of persons exposed.

FURTHER INFORMATION
WORK PRACTICE INFORMATION - Include ALL the processes involved in the use of a substance e.g. the Histology Laboratory may be preparing specimen pots for clinics. This will involve laboratory staff initially handling 2.5 litres of concentrated ‘Formaldehyde’ pouring the required amount into a measuring flask and diluting it with water to make a 10% working solution. This process will require a risk assessment. A second risk assessment will be required for decanting the diluted solution into the specimen pots for use in clinics etc.

EXISTING CONTROLS INFORMATION - List ALL the controls that are currently applied when using a substance, using the above example a fume cupboard would be used to dilute the substance to a working strength. The 10% solution would then be most likely used in a ‘well ventilated’ area in an operating theatre or clinic. If you depend upon general room ventilation where possible indicate the type of air-change method in the room and if possible the number of air-changes e.g. vents indicating mechanical ventilation, door and windows. Health & Safety can help in determining the number of air changes within a room.

IS THIS ASSESSMENT URGENT – if the assessment request is marked as urgent, it will be given priority over other requests.
# COSHH ASSESSMENT REQUEST FORM (CARQ)

## YOUR DETAILS

<table>
<thead>
<tr>
<th>Name:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone No:</td>
<td>Fax:</td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
</tbody>
</table>

## LOCATION DETAILS

(Where the chemical is used)

<table>
<thead>
<tr>
<th>Site:</th>
<th>Location Details:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department:</td>
<td>Sub work area code:</td>
</tr>
</tbody>
</table>

## MATERIAL DETAILS

<table>
<thead>
<tr>
<th>Assessment Code (if known):</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Trade Name:</td>
<td></td>
</tr>
<tr>
<td>Physical state (please tick):</td>
<td>Solid □ Liquid □ Gas/fume □</td>
</tr>
<tr>
<td>Supplier / Manufacturer:</td>
<td></td>
</tr>
<tr>
<td>Phone No:</td>
<td></td>
</tr>
</tbody>
</table>

**FOR NEW MATERIALS:**
Please include the Material Safety Data Sheet (MSDS) containing data that is not more than 5 years old

## MATERIAL EXPOSURE INFORMATION

<table>
<thead>
<tr>
<th>Method of application/exposure:</th>
<th>e.g. hand applying, spraying, laboratory work etc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area of exposure:</td>
<td>Inside Well Ventilated</td>
</tr>
<tr>
<td>Length of time exposed:</td>
<td>&lt;1/2 hour</td>
</tr>
<tr>
<td>Quantity of material used in one day:</td>
<td>e.g. 5ltrs, 2.5gm, 25ml etc</td>
</tr>
<tr>
<td>Frequency of use:</td>
<td>Daily</td>
</tr>
<tr>
<td>Number of people exposed with this application:</td>
<td></td>
</tr>
<tr>
<td>Are susceptible workers exposed?:</td>
<td>Yes (see below)</td>
</tr>
<tr>
<td>Susceptible category:</td>
<td>Elderly</td>
</tr>
<tr>
<td>Are other people exposed?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

## FURTHER INFORMATION

<table>
<thead>
<tr>
<th>Work Practice Information</th>
<th>Existing Controls Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>e.g. Concentrated substance poured into 5ltrs water and mixed using mixing spoon.</td>
<td>e.g. PPE worn when pouring the concentrated substance.</td>
</tr>
</tbody>
</table>

Is this assessment URGENT: (please circle) Yes No