Title:

Health & Safety
Control of Substances Hazardous to Health (COSHH) Policy

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Policy Owner: Head of Health and Safety

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Target Audience: All employees of NHS Lothian and other employees working on behalf of NHS Lothian

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Executive Summary

The Control of Substances Hazardous to Health Regulations 2002 (as amended) provides a legal framework to protect people against health risks arising from hazardous substances used or encountered at work. Employers have a responsibility to manage and minimise the risks from work activities. They must identify hazards and assess the risks, put in place actions to prevent and control these risks and review regularly these control measures. COSHH Regulation sets eight generic principles of good practice for the control of exposure to substances hazardous to health:

- Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health.
- Take into account all relevant routes of exposure when developing control measures
- Control exposure by measures that are proportionate to the health risk.
- Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health.
- Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment.
- Check and review regularly all elements of control measures.
- Inform and train all employees on the hazards and risks from the hazardous substances with which they work and the use of control measures put in place.
- Ensure that the control measures implemented do not increase the overall risk.

NHS Lothian recognises its legal and moral obligations on the use, storage, handling, production (e.g. generation of dust) and disposal of substances hazardous to health. This Policy establishes the framework which such management can take place and the responsibilities of the managers and staff in the implementation of these principles within NHS Lothian.
# Health and Safety Control of Substances Hazardous to Health (COSHH) Policy

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1.0 Purpose

The purpose of this Policy is to ensure the identification, assessment and control of substances hazardous to health and processes that can generate substances hazardous to health in order to remove or reduce harm to patients, staff and others from exposure to hazardous substances. There is a statutory requirement to comply with health and safety legislation and in addition to NHS Lothian policies and procedures.

This policy is in support of and should be read in conjunction with the NHS Lothian Health and Safety Policy, the COSHH Procedure and the COSHH Guideline.

2.0 Policy statement

NHS Lothian acknowledges that without careful evaluation, no substance can be considered completely safe. All reasonable steps will be taken to ensure that exposure of employees and others to substances hazardous to health is either prevented or, where this is not reasonably practicable adequately controlled.

3.0 Scope

This policy applies to all staff for and on behalf of NHS Lothian. Temporary and agency staff, volunteers, contractors, students and work experience personnel will also be expected to follow the requirements contained within this Policy.

This policy applies to all hazardous substances covered by the COSHH Regulations such as for example dangerous pathogens including blood borne viruses (BBV), chemical products, body fluids and medicines and all processes that can generate hazardous substances.

4.0 Definitions

4.1 Hazardous Substances under COSHH Regulations

“COSHH applies to a wide range of substances and preparations (mixtures of two or more substances) which have the potential to cause harm to health if they are ingested, inhaled, or are absorbed by, or come into contact with, the skin, or other body membranes.

Hazardous substances can occur in many forms, including solids, liquids, vapours, gases and fumes” (The Control of Substances Hazardous to Health Regulations 2002 (as amended). Approved Code of Practice and Guidance. L5 (sixth edition)).

COSHH Regulations does not cover asbestos, lead and clinical sharps which have their own regulations and substances that are hazardous to health because they are: radioactive, explosive, flammable or because they are used or stored at high or low temperature or high pressure.
4.2 Safety Data Sheet (SDS)

Safety Data Sheets are documents that provide information about the composition and physical, chemical and toxicological properties that help users to conduct a COSHH Assessments. They identify the hazards the chemical products present and give information on handling, storage, disposal, personal protective equipment (PPE) required, transport and emergency measures in case of accidents and fire. Suppliers of chemical are required by law to provide an up to date safety data sheet if a substance is dangerous for supply. The SDS is not a COSHH Assessment itself.

4.3 Local Exhaust Ventilation (LEV)

Local Exhaust Ventilation is extract ventilation which takes dusts, mists, gases, vapour or fumes out of the air so that they cannot be breathed in. Typically LEV can be found in specialist services such as Laboratories or workshops, hence most clinical services are unlikely to have LEV in place locally.

4.4 Personal Protective Equipment (PPE)

Personal Protective Equipment is equipment that will protect the user against health and safety risk at work. It can include, amongst other items, gloves, eye protection and respiratory protective equipment (RPE).

5.0 Implementation roles and responsibilities

The overall framework of accountability and responsibility for managers and staff on the implementation of this policy follows that laid out within the NHS Lothian Health and Safety Policy.

Further details are provided below on the manager(s) responsibilities

5.1 Line Managers’ Responsibilities

Communicate and implement the COSHH Policy and Procedure with your staff and ensure that they have understood their responsibilities.

5.2 All Staff

Take reasonable care of themselves and others who may be affected by their actions. Cooperating by following guidelines for safe work with hazardous substances and working in a manner which controls risk to as low a level as is reasonably practicable.

5.3 Occupational Health and Safety Service (OHSS)

OHSS will provide advice and support for managers on all aspects of COSHH. More specifically OHSS is responsible for:
- Delivering training in the process of COSHH assessments and control measures.
- Monitoring exposure when required.
- Providing Health Surveillance where identified and keep the health records for 40 years.

5.4 Infection Prevention and Control Service
- Provide competent advice and support in relation to control of infection arising from hazardous substances.
- Liaise with the OHSS as necessary.

5.5 Pharmacy
- Provide competent advice and support in relation to health hazards arising from pharmaceutical substances.
- Liaise with the OHSS as necessary.

5.6 NHS Lothian Facilities and PFI Providers
- Provide information and support on the maintenance of engineering control measures such as LEVs and other ventilation systems.

6.0 Associated materials
- COSHH Operational Procedure.
- COSHH Guideline
- COSHH Index.
- How to complete a COSHH Assessment.
- COSHH Assessment Form.
- Health & Safety Policy
- Adverse Event Management Policy and Operational Procedure.
- Risk Management Policy and Risk Register Operational Management Procedure
- Health Surveillance Policy
- Health Surveillance Procedure for Managers (Skin Health).
- Working with Bloodborne Viruses Strategic Policy and Procedures.
- Control of Contractors Policy.
7.0 Evidence base

The Control of Substances Hazardous to Health Regulations 2002 (as amended) (S.I.2002/2677).

European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures.


Control of Substances Hazardous to Health (COSHH) HSE website
http://www.hse.gov.uk/coshh/

Control of substances Hazardous to Health Regulations 2002 (as amended). Approved Code of Practice and Guidance. L5 (Sixth Edition), HSE Published 2013

EH40/005 Workplace exposure limits. Containing the list of workplace exposure limits for use with the Control of Substances Hazardous to Health Regulations (as amended). EH40 (Third edition), HSE Published 2018 http://www.hse.gov.uk/pubns/priced/eh40.pdf

Management and Operation of microbiological containment laboratories (Advisory Committee on Dangerous Pathogens). HSE Published 2018


Controlling airborne contaminants at work. A guide to local exhaust ventilation (LEV). HSG258 (Third edition), HSE Published 2017

8.0 Stakeholder consultation

All departments referenced in this policy have been consulted in the content.

This policy was placed on the NHS Lothian Consultation Zone for a 4-week period for all NHS Lothian staff to comment on.

9.0 Monitoring and review

The policy will be reviewed and revised every three years or as a result of any changes in level of risk and/or in legislation which may occur before this. This policy may also be subject to review if new guidance or legal opinion is issued or NHS Lothian identifies a need for revision as the result of inspection, audit or following investigation of an adverse event.