

Health and Safety

Control of Substances Hazardous to Health (COSHH) Operational Procedure







Purpose of this procedure:






The aim of this procedure is to establish the framework to implement the [Control of Substances Hazardous to Health \(COSHH\) Policy](#) 2.1 within the Organisation.

This procedure applies to all staff in NHS Lothian or working on behalf of NHS Lothian, particularly those with management responsibilities. Managers of temporary and agency staff, volunteers, contractors, students, and work experience personnel will also be expected to follow the requirements contained within this procedure. This Procedure applies to all hazardous substances covered by the [COSHH Regulations](#) used and/or produced by NHS Lothian and should be used in conjunction with the NHS Lothian [COSHH Policy](#).

The Procedure:

1. Communicate and share the [COSHH Policy](#) and [Procedure](#) with your staff and ensure that they have understood their responsibilities. Keep records of this communication.
2. Identify the substances hazardous to health used in your department and the processes that can create substances hazardous to health. Guidance on this identification can be obtained through the [HSE website](#). Contact the Health and Safety department if you need further support.
3. Complete your [COSHH Index](#). See associated materials at the end of this procedure for further information.
4. Collate the Safety Data Sheet (SDS) for all the substances hazardous to health used in your department. Suppliers of a chemical product(s) must by law provide an up to date (SDS) if a substance is dangerous for supply. Remember that the (SDS) is a source of information to complete your [COSHH Assessment](#), but it is not a [COSHH Assessment](#) itself.
5. As part of your [COSHH Assessment](#) consider all hazardous symbol labelling identified on the packaging and/or in the safety data sheet. E.g.,

Symbol	Hazard	Symbol	Hazard
	Explosive (Symbol: exploding bomb)		Hazardous to the environment (Symbol: Dead tree and fish)
	Flammable (Symbol: flame)		Health hazard/Hazardous to the ozone layer (Symbol: exclamation mark)

	Oxidising (Symbol: flame over circle)		Serious health hazard (Symbol: health hazard)
	Corrosive (Symbol: Corrosion)		Gas under pressure (Symbol: Gas cylinder)
	Acute toxicity (Symbol: Skull and crossbones)		

6. Refer to [EH40 2005 for workplace exposure limits](#).
7. With all the information available to you, conduct a full [COSHH Assessment](#) including the emergency arrangements, following the NHS Lothian [COSHH assessment](#) form. More information can be found in the associated information on the [intranet site](#) on [how to complete a COSHH Assessment](#).
8. Consult and involve your staff in the process.
9. Ensure that the control measures already in place or identified in the action plan within the COSHH assessment are properly used and maintained. A safe operating procedure may be required to be developed dependant on the substance hazardous to health that is being used.
10. Ensure that hazardous substances are stored in accordance with the safety data sheet. e.g., flammable liquids should be stored separately from other dangerous substances that may enhance the risk of fire or compromise the integrity of the container or cabinet it is stored in. Consider the requirements for storing chemicals such as controlled access, bunding and never storing oxidants with flammables, keeping substances separate that may react with each other.
11. Identify Local Exhaust Ventilation (LEV) used within your department if any. If (LEV) is used in your department, ensure that thorough examination and testing of the (LEV) is carried out at least once every 14 months by a competent person and keep records of this examination for at least 5 years.
12. Monitor staff exposure to substances hazardous to health, where required. Contact Health and Safety Department for further advice.
13. Ensure that health surveillance, including skin health, is conducted when this has been identified using the [Health Surveillance Policy](#) and associated [procedure](#) and has been specified in the relevant [COSHH Assessment](#) or the [COSHH Regulations](#) establishes it specifically. Contact the [Occupational Health Department](#) for further advice.
14. Prepare plans to deal with accidents, incidents and emergencies involving substances hazardous to health, for example, spillages and communicate this information to staff.
15. Review your [COSHH Assessments](#) annually or immediately as result of any significant change and/or adverse events involving substances hazardous to health and report your progress as part of the [Health and Safety Management Quarterly Reporting System \(Quarter 1\)](#).

16. Encourage your staff to report any adverse event related to substances hazardous to health and investigate them in line with the NHSL [Adverse Event Management Policy](#) and [Adverse Event Management Procedure](#).
17. As a result of the [COSHH Assessment](#) process, ensure that your staff receives suitable and sufficient information, instruction, and training regarding the risks involved and the necessary control measures.
18. Suitable supervision should be provided for staff and the level of supervision required should be proportionate to the level of risk.
19. Staff must report to a supervisor when controls are identified as ineffective or have failed.
20. Staff must not carry out any new procedure until it has been suitably assessed and the appropriate controls in place.
21. Maintain records of the COSHH process for 10 years, records of the maintenance of (LEV) if appropriate for 5 years and associated health records for 40 years.
22. Provide suitable Personal Protective Equipment (PPE) based on the level of risk.
23. Provide suitable Respiratory Protective Equipment ([RPE](#)) based on the level of risk. When the wearing of FFP3 respirators has been identified in the [COSHH assessment](#), ensure that Face Fit Testing (FFT) is carried out on regular basis or when changes to an individual has occurred (i.e., weight loss/gain).
24. Face Fit Testing can be arranged via the [Face Fit Testing Appointment App](#).
25. PPE is the last resort when considering the [hierarchy of controls](#) and safer alternative control measures must be considered in the first instance.

Associated materials/references:

- [Health and Safety-Control of Substances Hazardous to Health \(COSHH\) Policy](#)
- [COSHH Index](#)
- [How to complete a COSHH Assessment](#)