

Control of Substances Hazardous to Health (COSHH) Policy



Title:

Control of Substances Hazardous to Health (COSHH) Policy

Date effective from:	March 2023	Review date:	March 2026
Approved by:	Policy Approval Group		
Approval Date:	7 March 2023		
Author/s:	NHS Lothian Health & Safety Advisers		
Policy Owner:	Head of Health and Safety		
Executive Lead:	NHS Lothian Executive Medical Director		
Target Audience:	All employees of NHS Lothian and other employees working on behalf of NHS Lothian		
Supersedes:	COSHH Policy Control of Substances Hazardous to Health v2.0		
Keywords (min. 5):	COSHH, control, substances, hazardous, health, safety, PPE, RPE, surveillance		

Control of Substances Hazardous to Health (COSHH) Policy



Version Control

Date	Author	Version/Page	Reason for change
Feb 2016	Health & Safety Advisers	1.0	Approved
Nov 2018	Lead Health & Safety Adviser	1.1-4	Under review
June 2019	Lead Health & Safety Adviser	2.0	Approved
Oct 2022	Health & Safety Adviser	2.1-3	Under review
Mar 2023	Health & Safety Adviser	3.0	Approved by Policy Approval Group

Executive Summary

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.

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, in line with the [hierarchy of control](#), implement preventative actions to control these risks and regularly review the control measures.

Control of Substances Hazardous to Health (COSHH) Policy

Contents

	Page number
1.0 Purpose	4
2.0 Policy statement	4
3.0 Scope	5
4.0 Definitions	5
4.1 Hazardous Substances under COSHH Regulations	5
4.2 Safety Data Sheet (SDS)	5
4.3 Local Exhaust Ventilation (LEV)	5
4.4 Health Surveillance	6
4.5 Personal Protective Equipment (PPE)	6
5.0 Implementation roles and responsibilities	6
5.1 Service/Departmental Managers	6
5.2 Staff	7
5.3 Occupational Health and Safety Service (OHSS)	7
5.4 Infection Prevention and Control Service	8
5.5 Pharmacy	8
5.6 NHS Lothian Estates & Facilities and PFI Providers	8
6.0 Associated materials	8
7.0 Evidence base	9
8.0 Stakeholder consultation	9
9.0 Monitoring and review	10

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, 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.

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.

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. Employers must identify hazards, assess the risks, put in place actions to prevent and control these risks, and regularly review these control measures.

[COSHH Regulations](#) set 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.
- Consider all relevant routes of exposure – inhalation, skin, and ingestion – when developing control measures, and control exposure employing 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.
- Regularly check and review all elements of control measures for their continuing effectiveness.
- Inform and train all employees on the hazards and risks from the hazardous substances with which they work, and the use of control measures developed to minimise the risks.
- Ensure that the control measures implemented do not increase the overall risk.

3.0 Scope

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

This policy applies to all hazardous substances covered by the [COSHH Regulations](#), for example: dangerous pathogens including blood borne viruses (BBV), chemical products, body fluids, medicines, and all processes that can generate hazardous substances, including those on the Health and Safety Executive's (HSE) [Approved List of Biological agents](#).

4.0 Definitions

4.1 Hazardous Substances under COSHH Regulations

The Control of Substances Hazardous to Health (COSHH) Regulations apply 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, absorbed by, or contact the skin or other body membranes.

Hazardous substances can occur in many forms, including solids, liquids, vapours, gases, and fumes. They can also be asphyxiants or biological agents. [The Control of Substances Hazardous to Health Regulations 2002](#) (as amended). [Approved Code of Practice and Guidance. L5 \(sixth edition\)](#).

[COSHH Regulations](#) do 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, and respiratory protective equipment (PPE/RPE) required, transport and emergency measures in case of accidents and fire. The suppliers of chemicals 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. Staff must ensure that the safety data sheet being used is the most up-to-date version.

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 inhaled. Typically, LEV can be found in specialist services such as Laboratories or workshops.

4.4 Health Surveillance

Health Surveillance is aimed at the early identification of ill-health, and identifying areas for improvement, related to certain work activities.

Health Surveillance is a system of ongoing health checks for employees working with, or exposed to, environmental risks including noise, vibration, ionising radiation, hazardous substances, fumes, dusts, and biological agents.

Health Surveillance is carried out by competent Occupational Health Clinicians.

Types of Health Surveillance include:

Respiratory (spirometry)– primarily for staff exposed to potential airborne sensitisers and asthmagens at work.

Skin– primarily for staff exposed to sensitisers/irritants, wet work, frequent hand hygiene or glove changes, where exposure to some or all these factors may result in skin disease or reactions/changes to skin

4.5 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) 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). PPE is the last resort and collective controls should be put in place in the first instance.

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 Service/Departmental Managers

- Are required to communicate and discuss the COSHH Policy with their staff.
- Work with their teams to complete a COSHH (risk) assessment for the use of substances hazardous to health.
- Ensure that staff consider the elimination of harmful substances and the use of safer alternatives.
- Ensure that staff who use hazardous substances (including bank staff and others) are aware of the hazards, risks and the control measures required to undertake the work safely.
- Ensure adequate first aid arrangements are in place.
- Ensure that hazardous substances are not accessible to vulnerable persons by providing lockable COSHH cabinets.

- Ensure that spill kits are available and fully stocked (with non-expired stock), and that staff are trained in their use.
- Ensure that spillage procedures have been developed for high-risk substances.
- Ensure that staff who work with hazardous substances are provided with suitable and sufficient information, instruction, training, and suitable supervision where required.
- Ensure staff training records on the use of hazardous substances are in place, readily accessible and kept up-to-date.
- Ensure that health surveillance checks have been arranged for staff who use hazardous substances.
- All adverse events involving hazardous substances causing injury or otherwise, are reported via [DATIX](#) and are investigated following the process laid down in the NHS Lothian [Adverse Event Management Policy](#) and [Adverse Event Management Procedure](#).

5.2 Staff

- All staff are accountable for their own actions and must follow all policies and procedures designed to ensure safer ways of working.
- To contribute to the risk assessment process when requested.
- Follow the control measures identified in the risk assessment and any instruction(s) provided where a safe system of work is used.
- Staff must only use substances approved via NHS Lothian supply chains and not use alternative products.
- Ensure any information, instruction, training, or supervision to minimize exposure to a substance hazardous to health is understood.
- Attend training and any updates or refreshers provided to maintain their skill level in relation to working with substances hazardous to health.
- Report any injuries, incidents and/or near misses resulting from working with substances hazardous to health to their manager and on the adverse event reporting system ([DATIX](#)).

5.3 Occupational Health and Safety Service (OHSS)

The NHS Lothian 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.
- Providing advice, where applicable, on the requirement for occupational hygiene intervention in relation to monitoring workplace exposure.
- The Occupational Health service will carry out a medical check on candidates prior to the commencement of employment.

- Providing Health Surveillance when identified, and to keep the corresponding 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 Estates & Facilities and PFI Providers

- Provide information and support on the maintenance of engineering control measures such as LEVs and other ventilation systems.
- Provide information and advice on waste management.

6.0 Associated materials

[COSHH Procedure](#) approved by NHS Lothian Health and Safety Committee, June 2019

[COSHH Index](#), June 2019

[How to complete a COSHH assessment](#), June 2019

[COSHH Assessment Form](#), June 2019

[NHS Lothian Health and Safety Policy](#) approved by NHS Lothian Board, April 2021

[Adverse Event Management Policy](#) approved by the Policy Approval Group, June 2018

[Adverse Event Management Procedure](#) approved by the Policy Approval Group, July 2018

[Risk Management Policy](#) approved by NHS Lothian Board, October 2018

[Risk Management Operational Procedure](#) approved by NHS Lothian Board, October 2018

[Health Surveillance Policy](#) approved by the Policy Approval Group, March 2023

[Health Surveillance Procedure for Managers \(Skin Health\)](#) approved by NHS Lothian Health & Safety Committee

[Working with Bloodborne Viruses Policy](#) approved by the Policy Approval Group, May 2021

[Operational Procedure for Working with Blood Borne Viruses](#) approved by NHS Lothian Health and Safety Committee, May 2021

[NHS Scotland National Infection Prevention and Control Manual \(NIPCM\)](#). Chief Nursing Officer

[Clinical Sharps Devices Policy](#) approved by the Policy Approval Group, March 2023

[Control of Contractors Policy](#) approved by the Policy Approval Group, December 2021

[First Aid](#)

7.0 Evidence base

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

[The Control of Substances Hazardous to Health Regulations 2002 \(legislation.gov.uk\)](#)

The Approved List of Biological Agents.

<https://www.hse.gov.uk/pubns/misc208.pdf>

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

<https://osha.europa.eu/en/legislation/directives/regulation-ec-no-1272-2008-classification-labelling-and-packaging-of-substances-and-mixtures>

Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

<https://osha.europa.eu/en/legislation/directives/regulation-ec-no-1907-2006-of-the-european-parliament-and-of-the-council>

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

<http://hse.gov.uk/pubns/priced/l5.pdf>

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

<http://www.hse.gov.uk/biosafety/management-containment-labs.pdf>

Respiratory Protective Equipment at work. A practical guide. HSG53 (Fourth edition), HSE Published 2013 <http://www.hse.gov.uk/pubns/priced/hsg53.pdf>

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

<http://www.hse.gov.uk/pubns/priced/hsg258.pdf>

8.0 Stakeholder consultation

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

A draft of this policy was placed on the NHS Lothian Consultation Zone to give all NHS Lothian staff an opportunity to provide comment.

9.0 Monitoring and review

9.1 Proactive management

The management and use of COSHH is reviewed and reported on annually as part of the [Health and Safety Management \(HSM\) Quarterly Reporting System](#).

Documented information is gathered at ward/department level and the provided to the Service(s)/HSCP Management Teams. Health and safety assurance reports are then provided to the respective local Health and Safety Committees. This information is then provided to the NHS Lothian Health and Safety Committee with the overall NHS Lothian risk assurance level for COSHH is provided to the Staff Governance Committee.

Operational managers must also undertake monitoring of all tasks where hazardous substances are involved to ensure compliance with procedures, for example the use of Infection Prevention Control Audits, Safety Tours/Walk rounds or similar checks or visits.

Each Service/Department must comply with the requirements of the Infection Prevention and Control Manual in relation to the safe use of hazardous substances.

9.2 Reactive management

All adverse events involving hazardous substances must be reported using the DATIX system and investigated in line with the [Adverse Event Management Policy](#) and [Adverse Event Management Procedure](#).

A report should be made to the HSE [Reporting of Injuries, Diseases and Dangerous Occurrences' Regulations 2013 \(RIDDOR\)](#), whenever there is reasonable evidence suggesting that an occupational exposure is linked to a workplace hazardous substance. The doctor may indicate the significance of any occupational factors when communicating their diagnosis.

9.3 Review

This policy will be subject to review and updated every 3 years, as a minimum, or because 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.

The effectiveness of this policy may also be monitored and evaluated using the outputs from:

- SAE Reviews
- DATIX investigations

- Complaint investigations/improvement plans
- Health & Safety Quarterly Reports (compliance with relevant policies/risk assessments)

The review and update will be undertaken by key stakeholders in the policy including Clinical Services, Clinical Procurement, Partnership Representatives and the Health and Safety (H&S) Advisory Team.

This policy may also be subject to review if new guidance or legislation changes, or NHS Lothian has a serious case that through a system failure(s) merits the policy to be reviewed.