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Ymddiriedolaeth GIG
Prifysgol Felindre
Velindre University
NHS Trust

Ref: QS33

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

Executive Sponsor & Function

Executive Director of Strategic Transformation,
Planning, and Digital
Health and Safety Function

Document Author:

Trust Health and Safety Manager

Approved by:

Quality, Safety and Performance Committee

Approval Date:

16th January 2024

Date of Equality Impact Assessment:

November 2023

Equality Impact Assessment Outcome:

This policy has been screened for relevance to equality. No potential negative impact has been identified.

Review Date:

January 2027

Version:

5.0

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1. Policy Statement

Velindre University NHS Trust attaches great importance to the health, safety and welfare of its patients, staff and visitors, whilst fulfilling its statutory obligations within the law.

This policy outlines the requirements for the management and control of substances that are hazardous to health (CoSHH) within the organisation, in accordance with current legislation. It includes the use of and the storage and transportation of any substance that is hazardous to health.

2. Scope of Policy

This policy applies to all staff employed by or contracted to the Trust, including those within Hosted Organisations. It applies to all areas where hazardous substances are used, stored or generated.

Failure to follow guidance in this policy will increase the risk of hazardous substance related injuries / illness to the user, other staff, patients, donors and visitors.

3. Aims and Objectives

Velindre University NHS Trust intends, so far as is reasonably practicable, to protect its employees and those affected by its undertaking from the harmful effects of substances that may be used in fulfilling its business.

4. Responsibilities

4.1. Chief Executive

The Chief Executive has overall accountability for health and safety within the organisation, making sure that arrangements are in place for:

- ensuring that there is an Executive Director appointed as a lead for health and safety
- ensuring that the Trust Board and Executive Management Board is informed as required on health and safety matters affecting employees and/or the public
- ensuring that the Trust's CoSHH policy is implemented
- supporting training and development of staff
- ensuring that there are sufficient resources for the implementation of this policy

4.2. Executive Director of Strategic Transformation, Planning and Digital

The Executive Director of Strategic Transformation, Planning and Digital has delegated responsibility at Trust Board level for managing health and safety and is responsible for ensuring that:

- the Trust's CoSHH policy is reviewed as and when appropriate
- regular updates on health and safety issues are reported to the Executive Management Board

In addition to the delegated responsibilities for managing Health and Safety, the Director of Strategic Transformation, Planning and Digital should ensure that:

- there are appropriate arrangements in place to respond to major incidents and emergencies which could expose people to substances hazardous to health.
- risks to the health and safety of employees and others from workplace environments, in new build and / or refurbished property owned by the Trust are eliminated / reduced by ensuring that precautions for the control of substances hazardous to health are incorporated at the design stage of any new build or refurbishment to Trust property
- work equipment provided as part of a new build or refurbishment scheme is suitable for the work environment and for employees that use the equipment. Work equipment (including the relevant level of personal protective equipment), should not expose employees to any hazardous substance so far as is reasonably practicable.

4.3. Executive Director of Organisational Development and Workforce

The Executive Director of Organisational Development and Workforce is responsible for ensuring that: -

- there is an effective training programme that includes specific CoSHH training where required, which is appropriately monitored and recorded
- reports on work related illness or work-related ill health that is attributable to substances hazardous to health, are submitted to the trust Estates Assurance Meeting.
- pre-employment screening is carried out and provide advice to managers on any pre-existing conditions identified as part of that process
- arrangements are in place for health surveillance of in-service employees and others, such as work experience and students, where there is a specific requirement under CoSHH regulation.

4.4. Assistant Director of Estates, Environment & Capital Development

The Assistant Director of Estates, Environment & Capital Development will make arrangements to: -

- ensure that competent risk management and health and safety advice is available to all divisions and hosted organisations of the Trust and to support the appointed health and safety lead managers in developing and maintaining their CoSHH safety management systems and training. Competent advice may be sourced both internally and externally, dependant on the nature of the topic.
- provide support to the Executive Director with delegated responsibility for CoSHH management across the Trust, divisional directors, operational managers and health and safety leads in the implementation of, and monitoring compliance with, the CoSHH policy.
- ensure that information is available throughout the Trust on the management of CoSHH in order to evolve action plans to improve or maintain standards
- provide support to investigate incidents and report to senior managers on findings and, where necessary, provide recommendations

4.5. Health and Safety Manager and Divisional H&S Advisors/Leads

The Health and Safety Manager with the support of Divisional H&S leads is responsible for providing advice and guidance to managers on the effective implementation of this policy and safe working methods.

4.6. Divisional Directors / Directors of Hosted Organisations

Directors have overall responsibility for making sure that arrangements are in place for:

- establishing a local health & safety group which comprises representatives from all relevant departments and staff representatives, within their service area, where CoSHH issues or concerns can be discussed.
- liaising with the Trust Capital Planning and Estates department.
- ensuring that local CoSHH procedures are developed and implemented in line with the overarching trust policy
- preparing and implementing the organisational structure and allocating responsibility for CoSHH management within the service area and that the identified personnel (e.g. Senior Manager) are aware of their responsibility
- ensuring that CoSHH risk assessments have been implemented for all relevant activities within the service area
- ensuring that employees are trained to use, handle and store safely and correctly, any substances used in work activities
- ensuring that they are familiar with and ensure that all employees under their control are aware of:
 - any contingency plan involving spillage
 - the safe disposal of unwanted substances
 - first aid arrangements appropriate to the substances used

4.7. Department Managers

Department managers have overall responsibility for making sure that arrangements are in place within their department to:

- identify any substances hazardous to health that are in use within their department and ensure that the appropriate paperwork is accessible to staff e.g.
- safety data sheets etc.
- ensure that a CoSHH hazard and risk assessment is carried out, in line with current legislation and trust policy. The assessment should detail all exposure scenarios and include all activities to ensure that staff have access to sufficient information about the risks they face and the preventive / control measures that are required. The risk assessment should be regularly reviewed.
- identify any specific CoSHH training that may be required by departmental staff via the PADR process and advise the Education and Development Team to ensure that this is reflected within the job profile on the ESR system.
- identify any health surveillance that may be required for staff and liaise with local Workforce personnel to ensure that an appropriate level of occupational health surveillance is readily accessible to staff, e.g. skin checks, lung function tests etc.
- have access to specialist advice by liaising with the local Health & Safety lead, specialist advisor or the Trust Capital Planning and Estates department
- ensure that individuals are aware of their responsibilities for CoSHH management and have access to current / up to date safety data sheets and risk assessments.
- develop and implement a local departmental CoSHH procedure or safe system of work
- consult and involve staff and safety representatives with local CoSHH management
- ensure that all hazardous substances are used, stored and handled in the prescribed manner

4.8. CoSHH department Leads

Department Managers will designate a member of staff within the department that will have the responsibility to manage the CoSHH arrangements for that particular Department. They will be trained on the use of Sypol the current CoSHH management system. This will ensure that effective CoSHH management system is maintained within the departments that are using the hazardous substances. Divisions may rely on divisional safety leads to provide them with advice and guidance appropriate to their service needs.

CoSHH compliance within the department will be monitored by the divisional H&S Managers and will act as the main contact between the division Health &

Safety Groups and the Trust Health Safety and Fire Board in order that effective communication is created and maintained.

4.9. Safety Representatives

Employees who have been formally appointed by their professional organisation or Staff Side organisation, to act as a health and safety representative for their members are entitled to make representation to their managers on general matters affecting the health safety and welfare at work of any employee and investigate potential CoSHH related hazards, dangerous occurrences, causes of incidents and complaints by employees, at the workplace

4.10. Individual Employees

All employees have a statutory duty of care, both for their own personal safety and that of others who may be affected by their acts or omissions.

- all employees are required to co- operate with their Manager/Supervisor to enable the Trust to meet its own legal duties under CoSHH regulation
- all employees are expected, in the course of their employment, to report to their Manager/Supervisor any hazardous situations or defective equipment that could result in exposure to a hazardous substance and to report incidents in line with local reporting procedures
- to follow the guidance contained in CoSHH risk assessments and to follow the risk reduction control measures recommended, e.g. using/wearing safety equipment / devices provided to them
- where appropriate, to attend occupational health medical examinations at the appointed time and give information about their health that may be reasonably required.

4.11. Committees and Management Groups

The following committees / groups will provide advice to the appropriate Executive Director in order to ensure that accountability is being discharged properly and to ensure that the aims and objectives of the Trust are being achieved. Committees include:

- Trust Estates Assurance Meeting
- Trust Infection Prevention and Control Management Group
- Trust Medical Devices and Equipment Management Group and / or relevant sub group
- Trust Water Safety Group
- Trust Research, Development and Innovation Operational Management Group










6. Definitions

6.1. Hazardous substances include:

- Substances used directly in work activities (e.g. cleaning agents)
- Substances generated during work activities (e.g. fumes from welding)
- Biological agents such as bacteria and other micro-organisms.

Under CoSHH Regulations, there are a range of substances regarded as hazardous to health which include: -

- Substances or mixtures classified as dangerous by law (listed in table 3.2 of part 3, Annex VI of (CLP Regulations)). These can be identified by their warning label which will have one or more of the following hazard symbols and the supplier must provide a safety data sheet for them: -

 Explosive (Symbol: exploding bomb)	 Hazardous to the environment (Symbol: Dead tree and fish)	 Corrosive (Symbol: Corrosion)
 Flammable (Symbol: flame)	 Health hazard/Hazardous to the ozone layer (Symbol: Exclamation mark)	 Gas under pressure (Symbol: Gas cylinder)
 Oxidising (Symbol: flame over circle)	 Serious health hazard (Symbol: health hazard)	 Acute toxicity (Symbol: Skull and crossbones)

- Substances with workplace exposure limits are listed in the [HSE publication EH40](#)

- Biological agents (bacteria and other micro-organisms), if they are directly connected with the work e.g. exposure to bacteria from an air conditioning system that is not properly maintained).
- Any kind of dust if its average concentration in the air exceeds the levels specified in the CoSHH regulations.
- Any other substance which creates a risk to health, but which for technical reasons, are covered by different legislation including asphyxiates, pesticides, medicines, cosmetics or substances produced in chemical processes.

Substances that are hazardous to health, can take many forms and include liquids, fumes, dusts, vapours, mists, nanotechnology, gases (and asphyxiating gases) and biological agents (germs) that cause diseases such as leptospirosis or legionnaires disease and germs used in laboratories

If the packaging has any of the hazard symbols then it is classed as a hazardous substance.

CoSHH does not apply to: -

- Asbestos, Lead or Radioactive Substances, which have their own legislation
- Biological Agents not directly related to the work environment (e.g. flu)
- Substances which are hazardous only because they are radioactive, at high pressure, at extreme temperature or have explosive or flammable properties (other regulations apply to these risks)

7. Implementation/Policy Compliance

In order to comply with the CoSHH Regulations, the following action must be taken locally to prevent or reduce workers exposure to hazardous substances: -

- Identify what substances are present, or in use, that would be classed as hazardous to health and find out what the health hazards are;

Consider the following:

- What do you do that involves hazardous substances?
- Can you avoid using a hazardous substance or use a safer process – preventing exposure, e.g. using water-based rather than solvent-based products, applying by brush rather than spraying?
- Can you substitute it for something safer – e.g. swap an irritant cleaning product for something milder, or using a vacuum cleaner rather than a brush?
- Can you use a safer form, e.g. can you use a solid rather than liquid to avoid splashes or a waxy solid instead of a dry powder to avoid dust?
- decide how to prevent harm to health by undertaking a CoSHH risk assessment;

If you can't prevent exposure, you need to control it adequately by applying the HSE's [principles of good control practice](#).

[Minimise emission, release and spread](#)
[Consider routes of exposure](#)
[Choose control measures proportionate to the risk](#)
[Choose effective control options](#)
[Personal protective equipment – the final control option](#)
[Review the effectiveness of controls](#)
[Provide information and training](#)
[New measures, new risks](#)

The above principles are all equally important in achieving adequate control. Also, the Principles are not listed in rank order: The first principle is not more important than the last principle, although there is a logical progression in how they are presented and should be considered.

7.1. Risk Assessment

The COSHH Regulations require an assessment of risk to be undertaken for tasks involving the use of hazardous substances (see section 5 for definition of a hazardous substance).

When undertaking the assessment, consideration should be given to the following:

- The hazardous properties of the substance
- Information on health effects provided by the supplier
- The level, type and duration of exposure
- The circumstances of the work, including the quantity used
- The potential routes of exposure, e.g. inhalation, ingestion, injection and absorption
- Activities such as maintenance where there is the potential for a high level of exposure
- Any relevant workplace exposure limit or similar occupational exposure limit
- The effect of preventive and control measures which have been or will be taken
- The results of relevant health surveillance
- The results of monitoring of exposure
- The risk presented by exposure to a combination of substances
- Any additional information needed in order to complete the risk assessment.

The Health and Safety Executive (HSE), in collaboration with the Trades Union Congress (TUC) and the Confederation of British Industry (CBI), have developed a [COSHH Essentials](#) website and where there is no local access to COSHH risk assessments, this website can be referenced. *COSHH essentials* is a generic risk assessment scheme for a wide range of hazardous substances covered by CHIP and COSHH. It leads users to appropriate control advice for a range of common tasks. *COSHH essentials* can be used as a basis for the recording of the risk assessment. Whilst *COSHH essentials* has been designed to ensure that a precautionary approach

is taken towards control it is a generic guide and cannot guarantee that in all circumstances it will lead to full compliance with the Regulations assessment control requirements.

7.2. Information, Instruction and Training

Following the completion of a COSHH risk assessment the need for information, instruction and training must be considered and appropriate arrangements made by the manager. These might range from a simple instruction to regular formal sessions. Wherever employees are exposed to hazardous substances they must receive information, instruction and, where appropriate, training in the following:

- The risks to health created by their exposure
- The precautions that should be taken
- Control measures, their purpose and how to use them
- How to use personal protective equipment and clothing provided
- Results of any exposure monitoring and health surveillance.

7.3. Health Surveillance

In certain circumstances it will be necessary to undertake health surveillance for employees. Health surveillance is a systematic process which is required when:

- a) there is an identifiable disease or adverse health effect associated with the work,
- b) there is a reasonable possibility that the effect may occur under the conditions of the work (e.g. if control is dependent on Personal Protective Equipment) and
- c) there is a valid means for detecting the effect before it becomes permanent.

The objective of health surveillance is to:

- Protect the health of individual employees by detecting as early as possible adverse changes which may be caused by exposure to hazardous substances
- Help evaluate the measure(s) taken to control exposure
- Collect, keep up to date, and use data and information for determining and evaluating hazards to health.

Health surveillance will be undertaken via the Occupational Health Service, under local arrangements, as required.

7.4. Emergency Arrangements

Where the risks of a substance escaping are high, or the substance is especially hazardous, the local manager will ensure that emergency arrangements are in place as part of the risk assessment process. Guidance can be found on the supplier's Safety Data Sheet.

7.5. Personal Protective Equipment

Where the risk assessment has concluded that it is necessary to use personal protective equipment (PPE), this shall comply with the provisions of the Personal Protective Equipment Regulations 2002.

The main requirement of the Regulations is that PPE is to be supplied and used at work wherever there are risks to health and safety that cannot be adequately controlled in other ways.

The Regulations also require that PPE

- is properly assessed before use to ensure it is suitable;
- is maintained and stored properly;
- is provided with instructions on how to use it safely; and • is used correctly by employees.

PPE, including protective clothing, must be

- properly stored in a well-defined place;
- checked at suitable intervals; and
- when discovered to be defective, repaired or replaced before further use.
- personal protective equipment which may be contaminated by a substance hazardous to health must be removed on leaving the working area and kept apart from uncontaminated clothing and equipment. This equipment must be subsequently decontaminated and cleaned or, if necessary, destroyed.

7.6. Engineering Controls

All control measures in use should be visually checked, where possible, at appropriate intervals and without undue risk to maintenance staff. In the case of local exhaust ventilation (LEV) and work enclosures, such checks should be carried out at least once a week.

Procedures for servicing equipment should specify:

- (a) which engineering control measures need servicing;
- (b) the work to be carried out on each of them;
- (c) when the work should be done;
- (d) who is to do the work and who is responsible for it; and (e) how to put right any defects found.

In most circumstances control measures will include defined working procedures. These should be observed regularly to check that they are still being followed. They should also be reviewed periodically to confirm that they are still appropriate and workable and to see whether they can be improved.

Local exhaust ventilation plant (e.g. fume cupboards) must be inspected at least once every 14 months. Where respiratory protective equipment (RPE) (other than

disposable RPE) is provided, thorough examination and, where appropriate, testing of that equipment must be carried out at suitable intervals. Records of examinations and tests carried out, and of any repairs carried out as a result of those examinations and tests, must be kept for at least 5 years.

7.7. Exposure Monitoring

Where the COSHH assessment shows it is necessary, valid and suitable occupational hygiene techniques should be used to estimate the amount of employees' exposure to substances hazardous to health. For airborne contaminants, this measurement will normally involve collecting a sample of air from the employee's breathing zone using personal sampling equipment. It may also, where appropriate, involve sampling the air at the workplace periodically or continuously, using static sampling equipment.

Where air sampling techniques alone may not give a reliable indication of exposure, e.g. where there is skin absorption, ingestion or where RPE is being used to adequately control exposure, biological monitoring is often a useful complementary technique to air monitoring.

7.8. Monitoring and Auditing

As part of the Health and Safety Audit process, evidence will be required to demonstrate that assessment of the use of Hazardous substances has looked at: -

- Investigation into whether there is a less hazardous alternative for the particular hazardous substances in current use.
- Any concerns in relation to occupational exposure to hazardous substances
- Confirmation that risk assessments have been either completed or reviewed and that all staff have been made aware of any associated risks through Sypol.
- The availability of current Safety Data Sheets for all hazardous substances in use within their remit.
- Confirmation that engineering controls such as LEV are inspected and maintained to schedule and that records are kept for the required 5 years
- The above information will be provided via Sypol.

7.9. General Housekeeping

It is vitally important that all chemicals that are used, handled and stored, are kept within their original packaging as far as reasonably practicable. This will ensure that the necessary information / hazardous nature of the chemical is available and visible to all. If the safety data sheet requires a specific method of storage e.g. locked cabinet, then this should be available prior to the procurement of the hazardous substance. Suitable spill kits should be readily available for use, along with PPE required to control or clear a spillage, as required by the safety data sheet. Decontamination procedures should be utilised as appropriate and appropriate measures in place to dispose of any spillage.

7.10. Procurement

Procurement have a role to play in ensuring that any potentially hazardous materials that they may procure or assist with procuring are as safe as possible for use.

This involves ensuring that Safety Data sheets can be obtained from the supplier and that the least harmful alternative is available / considered.

They would need to be aware of legislation such as REACH that may apply to certain chemicals and pass this information on to the end user.

Where necessary Procurement would need to pass on information that they are sent from the supplier, relating to the hazards of the chemical, to the end user.

8. Equality Impact Assessment Statement

This policy has been screened for relevance to equality. No potential negative impact has been identified.

9. References

- [The Health and Safety Executive provides access to a wide variety of guidance and information via its website](#)
- [The Control of Substances Hazardous to Health Regulations 2002 \(as amended\). Approved code of practice and guidance](#)
- [Working with substances hazardous to health - What you need to know about COSHH](#)
- [HSE COSHH Essentials Website](#)
- [Personal Protective Equipment relevant to CoSHH Regulations](#)
- [EH40/2005 Workplace Exposure Limits: Containing the list of workplace exposure limits for use with the Control of Substances Hazardous to Health Regulations 2002 \(as amended\)](#)
- [The European Regulation \(EC\) No 1272/2008 on classification, labelling and packaging of substances and mixtures](#)

10. Getting Help

Advisors for certain aspects of Health, Safety and Risk Management have been incorporated within the Trust structure, to provide specialist advice as outlined below:-

**Assistant Director of Estates,
Environment and Capital
Development**

Velindre NHS Trust Headquarters
2 Charnwood Court
Heol Billingsley, Parc Nantgarw
Cardiff CF5 7QZ

Health and Safety

Trust Health & Safety Manager
Velindre NHS Trust Headquarters
2 Charnwood Court
Heol Billingsley, Parc Nantgarw
Cardiff CF5 7QZ
Tel: WHTN 01875 6522

VCC Health & Safety Advisor
Velindre Cancer Centre
Velindre Road
Whitchurch
Cardiff CF14 2TL
Tel: 02920615888

WBS Health & Safety Advisor
Welsh Blood Service
Ely Valley Road
Talbot Green
Pontyclun CF72 9WB
Tel: 1797 2356

Fire (precautions and training)

Trust Fire Safety Advisor
Velindre University NHS Trust
Headquarters
2 Charnwood Court
Heol Billingsley, Parc Nantgarw
Cardiff CF5 7QZ
Tel: WHTN 01875 6522

Infection Prevention and Control

Senior Infection Control Nurse
Velindre Cancer Centre
Whitchurch
Cardiff CF14 2TL
Tel: WHTN 01875 6129

Occupational Health

Cardiff and the Vale University LHB
Heath Park
Cardiff CF14 4XW
E-mail: occupational.health@wales.nhs.uk
Telephone; 02920743264

Occupational Health provision has been established via formal service level agreements with the above-named local health boards. Staff working outside the Geographical region of South East Wales are provided with Occupational Health services via local arrangements with their Occupational Health provider. Where practical, the occupational health provision should cover formal health surveillance and health assessments in connection with identification of occupational hazards and risks, along with support and advice for staff.

11. Related Policies

There are numerous policies which should be considered alongside this policy. They are available via the [trust's intranet page](#).

12. Information, Instruction and Training

See sections 4.7, 4.8, 6 & 6.2.

13. Main Relevant Legislation

- The Health and Safety at Work etc., Act 1974
- The Control of Substances Hazardous to Health Regulations 2002 (as amended). Supported by the control of substances hazardous to health (L5) sixth Edition, published 2013, Approved Code of Practice and Guidance • See also section 8 – “References”