BrisDoc Patient care by people who care

NHS

Control of Substances Hazardous to Health Policy

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Contents

Introduction

BrisDoc is committed to providing a working environment that promotes the health, safety and welfare of patients, staff and the general public. BrisDoc recognises that effective health and safety management is an integral part of management practice and accepts its responsibility:

- for providing a safe and healthy workplace, and working environment
- to provide the systems and culture to support the identification and control of risks at work
- engage co-owners and self-employed staff in the promotion of safe working practices

A key commitment to this is compliance with the Control of Substances Hazardous to Health (COSHH) regulations 2002 (as amended) and other relevant legislation, including the provision of professional competence and adequate resources.

Wherever possible, BrisDoc will eliminate the use of hazardous substances. Where this is not feasible, exposure will be minimised by using the least hazardous substances available and taking all reasonable and practicable steps to ensure safety.

COSSH

The use of chemicals or other hazardous substances at work can put people's health at risk. HSE COSHH Information can be found at: http://www.hse.gov.uk/coshh/.

Employers must control exposure to hazardous substances to prevent ill health. COSHH regulations protect employees and others from risks associated with hazardous substances used, handled, processed, or disposed of at work.

Compliance with COSHH brings additional benefits such as:

- Improved productivity through effective stock controls
- Better co-owner understanding and compliance with health and safety requirements to prevent illness.

Effects from hazardous substances range from mild eye irritation to chronic lung disease or, on occasions, death. Such failures may lead to enforcement action, including prosecution under the COSHH Regulations and /or civil claims.

Definitions

"A hazardous substance is any substance used at work or arising from a work process which is or has the potential to cause harm to people's health".

…It may be in form of solid, liquid, powder, dust, aerosol, vapour, gas or micro-organism.

There are a range of substances regarded as hazardous to health under COSHH, these include:

- Substances or mixtures of substances classified as dangerous to health under the CLP Regulations (Classification, labelling and packaging of substances and mixtures) as set out in European Regulation (EC) No 1272/2008) effective from 1.6.2015.

These can be identified by their warning label as very toxic, toxic, harmful, sensitising, corrosive, irritant or toxic to reproduction *(see appendix 2)* and the supplier must provide a `safety data sheet, for them. Many commonly used dangerous substances are listed in the HSE publication *Approved Supply List.*

Suppliers must also decide if preparations and substances that are not in the A*pproved Supply List* are dangerous, and, if so, label them accordingly.

- Substances with Workplace Exposure Limits. These are listed in the HSE publication EH40/2005 Workplace Exposure limits.
- Biological agents (bacteria and other micro-organisms) capable of causing any infection, allergy, toxicity or other human health hazard. If they are directly connected with the work, such as with healthcare, sewage, or if the exposure is incidental to the work, e.g. exposure to bacteria from an air-conditioning system that is not properly maintained.
- Dust of any kind when present in concentrations determined by reference to EH40. If the average concentration in the air exceeds the levels specified in COSHH (e.g. 10mg/m3 for dust that can be inhaled).
- Any substance not in the above but which creates a comparable health hazard. Which for technical reasons may not be specifically covered by CHIP including:
  - Asphyxiates (i.e. gases such as liquid nitrogen, argon and helium, which, while not dangerous in themselves, can endanger life by reducing the amount of oxygen available to breathe)
  - Pesticides
  - Medicines
  - Cosmetics
  - Substances produced in chemical processes

Examples

Examples of hazardous substances associated with office work include:

- Photocopier toner and developer fluids
  - Ozone generation from photocopiers
- Domestic cleaning materials:
  - Bleach
  - Toilet cleaner
  - Window cleaner
  - Furniture polishes
  - Floor cleaners
- Fly sprays, mouse poisons and other pest control substances.

Substances excluded under COSHH and covered by independent regulations

COSHH applies to virtually **all** substances hazardous to health, except the following, which are dealt with by separate legislation.

- Asbestos and lead, which have their own regulations
- Substances which are hazardous only because they are: radioactive; at high pressure; at extreme temperatures; or have explosive or flammable properties (covered by other regulations)
- Biological agents that are outside the employer's control, e.g. catching an infection from a workmate. (If in doubt, contact Occupational Health Services for advice.)

For the majority of commercial chemicals, the presence (or not) of a warning label will indicate whether COSHH is relevant. For example, ordinary household washing-up liquid has no warning label and therefore no COSHH implications although good practice should still be followed. Bleach however, carries a warning label so COSHH does apply whilst being used in the workplace

Scope

This Policy describes the procedures, which should be followed by all BrisDoc co-owners. Self-employed staff, volunteers, work experience personnel and those on student placements will also be expected to comply with this policy.

Any other people likely to be affected should be informed of the risks of potentially hazardous substances and protected from harmful effects.

It also applies to any contractor, using any such substance in the execution of their contract with BrisDoc, who must, **prior** to using the substance, provide, as a minimum, the information required by this policy.

Reasonable Practicably

Reasonable practicability is a matter of balancing the degree of risk against the time, trouble, cost and physical difficulty of the measures necessary to avoid it. Clearly the greater the risk the more reasonable it is to do something about it; and vice versa. Judgement is driven by the risk and **not** the size or financial position of the employer concerned. Finding the balance is a matter of judgement informed by assessment, where decisions for compliance with COSHH are subject to reasonable practicability, then the assessment should indicate why a particular decision has been made.

Roles and Responsibilities

All Directors

The Directors will:

- Agree and disseminate the standards and procedures as outlined within the policy and ensure their implementation
- Identify and allocate resources (co-owners, equipment and access strategies) to comply with control measures to reduce COSHH risks as far as is reasonably practicable
- Facilitate and support managers in the setting up of safe systems of work
- Ensure access to training for all co-owners who may be at risk from using substances at work and the supervision of such work practices by a competent person

Director of Nursing, Allied Health Professionals and Governance

The Director of Nursing, Allied Health Professionals and Governance is responsible for:

- reviewing and monitoring the effectiveness of this policy

- advising and assisting Heads of Service and Practice Managers in meeting their responsibilities to carry out risk assessments (See appendix 1) and implementing control measures, as necessary
- Ensuring a database of incidents is maintained using LERIS and reported through the corporate meeting governance structure
- ensuring audit of compliance is undertaken regularly
- ensuring the relevant Health & Safety & Assurance Steering Group receives reports on COSHH assessments and issues, and that the Quality Board receives regular feedback
- external reporting as completed as required and in accordance with requirements of external agencies and RIDDOR.

Heads of Service and Practice Managers

It is the responsibility of Managers to:

- ensure that this policy is implemented within their service
- ensure that a H&S/COSHH link person is established within the team to develop enhanced knowledge and skills with respect to COSHH
- ensure that the use of Hazardous Substances in their areas is in accordance with this policy
- ensure that all reasonable steps are taken to maintain and where necessary, improve health and safety standards
- ensure that a schedule of substances used or produced in their service, or by their team, is produced and that a risk assessment is undertaken for each situation where hazardous substances are used, arise from, or may arise through the BrisDoc activities
- inform the Occupational Health Department about any employee with a suspected work-related health problem including any arising from hazardous substance
- ensure COSHH incidents are investigated and reported to the Health & Safety & Assurance Group
- ensure co-owners receive appropriate training and advice in substances used in the workplace

Health and Safety Leads

The Health and Safety Lead in each service will support their manager with:

- undertaking risk assessments (see appendix 1)
- producing safe systems of work
- investigating and reporting incidents
- sharing any learning within the Service and across BrisDoc

All Co-Owners

All co-owners will:

- be responsible for being aware of and understanding the contents of this policy
- abide by this policy and any decisions arising from its implementation including following instructions and advice given:
- through the risk assessment process
- in safe systems of work, and
- in manufacturers' safety data sheets and instructions for substance use

- take reasonable care for their own health and safety and co-operate with BrisDoc's safe working practices developed for the safe control and use of chemicals e.g. using personal protective equipment
- report any possible identified risk to health and safety to their Line Manager or Health and Safety Lead promptly
- contact Occupational Health Services if they have any health issues and attend for any screening required

Workforce Department

The Workforce Department is responsible for:

- sourcing and organising relevant training that ensures staff are able to comply with this policy
- supporting Line Managers with referrals to Occupational Health and liaising with the Occupational Health Department
- leading or supporting any disciplinary processes that might arise due to non-adherence to this policy

COSHH Management

Information, Instructions and Training

Information, instruction and training must be provided for co-owners working with hazardous substances. It must be suitable and *sufficient*, i.e. relevant to the substances being used and cover the full extent of risk. This detail is provided by the COSHH risk assessment (see appendix 1) for each substance.

Information - This should include details of the health risks and the precautions that should be taken. There should be information on how and when to use control measures. Where health surveillance is indicated, the staff concerned must be told about the procedures and have access to their own records.

Instructions - Employees must be instructed on how to carry out procedures safely and how to use control measures. They must also be instructed about procedures to be followed in any foreseeable emergency that may arise during work with a substance.

Training - Training must be given to people who need to use control measures and personal protective equipment (PPE). The training needs to cover the carrying out of risk assessments where appropriate.

Personal Protective Equipment (PPE)

BrisDoc will provide PPE when the risk presented by a work activity cannot be adequately controlled by other means. The proper use of such protective equipment can help to reduce risks to a minimum. BrisDoc will:

- Carry out an assessment of proposed PPE to determine whether it is suitable
- Take any necessary measures to remedy any risks found, as a result of the assessment
- Ensure that, where two or more items of PPE are used together, they are compatible and as effective as when used separately
- Arrange for adequate accommodation for the correct storage of PPE

- Train members of staff in the safe use of PPE for all risks
- Replace PPE, which has been provided to meet a statutory obligation, as necessary and at no cost to the employee
- Inform members of staff of any risks which exist
- Reassess as necessary if substances used or work processes change

Accidents & Emergency Measures

It is now a legal requirement to be prepared for emergencies. This will include events such as spillages and any special antidotes, which may be required to treat exposure. Should the spillage require the intervention of the emergency services (e.g. fire brigade) the person responsible for the process must ensure that the appropriate information (such as safety data sheets) is available for the emergency services. These will be published on Radar for all staff to access.

Health Surveillance

BrisDoc is required, by law, to carry out health surveillance where people may be affected by the chemicals or micro-organisms that they work with. Where necessary, this will be carried out by BrisDoc's Occupational Health Department:

- Where an identifiable disease is associated with exposure to that substance
- Known or suspected carcinogens
- Substances of recognised systemic toxicity (where ingestion, inhalation or absorption are probable)
- Substances known to cause sensitisation
- Substances known to cause dermatitis

Biological Agents

Biological hazardous agents are living micro-organisms capable of causing disease or harming the environment. They include viruses, bacteria, fungi, protozoa and parasites. Examples of occupationally acquired infections include:

- Hepatitis
- Tuberculosis
- Enteric infections
- HIV infection

All Biological agents should be given a classification depending on the hazard they present and the risk of infection. The categories are:

- GROUP 1 - Biological agents that are unlikely to cause human disease.
- GROUP 2 - Biological agents that can cause human disease and may be a hazard to employees. They are unlikely to spread to the community and there is usually an effective treatment available.
- GROUP 3 - Biological agents that can cause severe human disease and may be a serious hazard to employees. They may spread to the community but there is usually an effective treatment.

- GROUP 4 - Biological agents that can cause severe human disease and are a serious hazard to employees. They are likely to spread to the community and there is usually no effective treatment.

Control of Exposure to Biological Agents.

Wherever possible, exposure to biological agents is to be avoided. If this is not possible then the following control measures must be employed in the department/work area concerned:

- The number of employees exposed to the biological agent s will be reduced to the lowest level practicable
- The design of the work process and controls should be used to prevent or minimise the release of biological agents into the workplace
- All appropriate warning signs on the approach to and also in the workplace will be displayed
- Suitable plans on how to deal with accidents involving biological agents, including appropriate decontamination and disinfection procedures will be devised
- Secure and identifiable containers for contaminated waste will be provided and ensuring that such waste is suitably treated, so it can be safely handled, collected, stored, transported and disposed of
- Implement procedures for taking, handling and processing samples that may contain biological agents
- Provide collective protection measures and (where exposure cannot be adequately controlled by other means) introduce individual protection measures including, in particular, the supply of appropriate protective clothing or other special clothing
- The provision to employees of effective vaccines and ensuring that hygiene measures are instigated to prevent or reduce any accidental transfer or release of a biological agent, e.g. washing and toilet facilities and prohibition of eating, drinking, smoking or applying cosmetics in any areas where there is a risk of biological contamination

The word "appropriate" in relation to clothing and hygiene measures referred to above means appropriate for the risks involved and the conditions at the place where exposure to the risk may occur.

Co-Owners Exposed to Certain Biological Agents

Service Managers are responsible for producing information for anyone that has been exposed to Group 3 or 4 biological agents including details of the work involved and the biological agent if known. This information should be forwarded to the Occupational Health Department in order to arrange for the necessary health surveillance required under this Policy.

Carcinogenic & Cytotoxic Substances

The assessment of health risks has an especially vital role to play in the control of carcinogenic substances because the development of the clinical effects of cancer may take place many years after the first exposure, and there may be no warning signs of adverse effects. For any assessment of a carcinogenic substance the results should at least detail:

- The nature of the hazard and the nature and extent of exposure, including the identification of any co-owners who may be at particular risk
- Whether substitution by a less hazardous substance is reasonably practicable

- All control measures to be applied to prevent or reduce exposure and evidence that consideration has been given to not employing workers at particular risk in areas where they may be exposed to carcinogenic substances, such as pregnant women dealing with a transplacental carcinogen
- Operating and maintenance instructions and procedures where relevant, to ensure that exposure is minimised
- Precautions under non-routine conditions, including maintenance activities and emergencies
- Use of personal protective equipment
- Monitoring procedures
- Health surveillance procedures
- Arrangements for consultation with employees and their representatives including procedures for reporting defects in plant or precautions and details of essential information and training requirements

Control of exposure to carcinogenic substances

If the use of a safer alternative substance or process is not reasonably practicable then adequate control of exposure must be ensured. The use of the following hierarchy of controls should be used in all areas to help ensure adequate control:

- Total enclosure of a process or system
- Minimising, suppressing and containing the generation of carcinogenic spillages, dust, fumes, leaks and vapour through the use of appropriate plant, processes and systems of work
- Minimising the quantities of carcinogens on site and the number of persons likely to be exposed
- Prohibiting eating, drinking, smoking and application of cosmetics in contaminated areas
- Providing facilities for personal washing and *regular cleaning of walls and surfaces*
- Designate areas & installations that may be contaminated by carcinogens, and post suitable & sufficient warning signs
- Safe storage, handling and disposal of carcinogens, including the use of closed and clearly labelled containers
- Emergency procedures for dealing with uncontrolled release of a carcinogenic substance into a workplace
- Ensuring that personnel involved in storage, handling and disposal of carcinogenic substances are appropriately trained

Control of Exposure to Cytotoxic Substances

Cytotoxic substances (e.g. drugs) are toxic compounds known to have carcinogenic, mutagenic and/or teratogenic potential. With direct contact they may cause irritation to the skin, eyes, and mucous membranes, and ulceration and necrosis of tissue. The toxicity of cytotoxic drugs dictates that exposure of personnel to these drugs should be minimised. The hierarchy of control as described above should be implemented to ensure appropriate control of exposure. Potential risks to pharmacists, pharmacy technicians, nurses and physicians from repeated contact with parenteral cytotoxic drugs, can be effectively controlled using a combination of specific containment equipment and appropriate work techniques.

Governance and Recording

Wherever possible exposure to hazardous substances should be eliminated, where this is not possible appropriate risk reduction measures will be taken.

Risk assessments (see appendix 1) will be carried out, recorded and reviewed. Employees will follow the HSE eight-step guide in conjunction with the BrisDoc Risk Assessment

Reporting on risk assessments, COSHH incidents and issues will be in accordance with BrisDoc's Corporate meeting governance structure – specifically to the Health and Safety Assurance Group.

Change Register

Date	Version	Author	Change Details
21.2.14	2.2	CL Nicholls	Formatting, updated roles and responsibilities, new COSHH assessment form, inclusion of related policies and procedures
16.9.16	2.2	CL Nicholls	Update values slide and H&S Structure. Removal of all reference to CHIP now CLP regulation is enforced. Inclusion of additional related policies.
August 19	2.2	CL Nicholls	Map to new policy template, update titles and reference to governance structure
February 2023	2.3	Traci Clutterbuck	Map to new policy template, update titles, update management structure, update language from staff to co-owners, update the reporting structure from LOBs to Quality Board
August 2025	2.4	Traci Clutterbuck	Updated governance structure diagram. Updated appendices. Updated structure and full review.

Appendix 1 - COSHH Risk assessment

Guidance notes

STEP 1: Summary of Risk / Hazard

Look only for hazards which you could reasonably expect to result in significant harm e.g. Fire (flammable materials, escape routes), Hazardous substances (bleach, blood, waste), Use of equipment (X-ray, laser), Dust / fumes (poor ventilation)

STEP 2: Persons Affected

Don't list individuals by name, just think about groups of people doing similar work or who may be affected e.g.: Office staff, Clinical staff, Contractors, Cleaners, Members of the public, People sharing your workplace. Pay particular attention to: People with disability Inexperienced/young people, Visitors, Lone workers

STEP 3: Evaluate the Risk and identify the Current Controls In Place

Have you already taken precautions against the risks from the hazards listed? For example have you provided: Adequate information, instruction or training?

Adequate systems of work or procedures?

Do the precautions:

- Meet the standards set by a legal requirement? Represent good practice?
- Reduce risk so far as is reasonably practicable? If so, the risks are adequately controlled, but you need to list the precautions that you have in place.
- You may refer to policies and procedures etc. giving this information.

STEP 4: Action Plan

What more could you reasonably do for those risks which you found were not adequately controlled?

You will need to give priority to those risks which affect large numbers of people and could result in serious harm.

Apply the following principles:

- Remove the risk completely, Try a less risky option
- Prevent access to the hazard
- Organise work to reduce exposure to the hazard
- Issue personal protective equipment
- Provide adequate welfare facilities e.g. washing facilities and first aid

STEP 5: Record findings

Establish review criteria and follow-up accordingly.

		TITLE					
Product Name				**Risk Assessment Number**		*From Risk Assessment Log*	
Manufacturer				**Product Code**			
Manufacturer Contact Number				**Manufacturer's CAS Ref. (on Safety Data Sheet)**			
Manufacturer Safety Data Sheet (MSDS)	**Yes / No**			**Date of MSDS**			
Hazard Classifications *(Tick as appropriate)*		 Explosive		 Corrosive		 Acute toxicity	
		 Flammable		 Hazardous to the environment		 Health hazard/Irritant/Hazardous to the ozone layer	
		 Oxidising		 Serious health hazard		 Gas under pressure	
Product *Include Image of product*	*Description of the product and where and how it is used and stored*						
Are Any Hazardous Substances Produced by any Processes?	*Description of any hazardous substances that are produced as a result of using the product or the product being combined with another substance intentionally of accidentally.*						
Who might it effect? 	*Description of who may be affected by the product, where and how. Include Staff, patients, visitors, contractors and emergency services.*						
Controls in Place		**Total enclosure of the process**		**Partial enclosure of the process**		**General workplace ventilation**	
		Wet methods (to control dust)		**Respiratory Protection**		**Eye Protection**	
		Gloves		**Overalls**		**Other**	
Precautions & Personal Protection 	*Description of the Protective equipment and precautions required to use the product including how it should be stored and what must not be done with or near to the product*						

Emergency First Aid 	*Description of the emergency first aid that should be given if the product comes into contact with a person*					
Action in case of Emergency 	*Description of the actions that should be taken is the product is spilled or leaks*					
Environmental Implications 	*Description of the impact on the environment should the product leak or get spilled*					
Storage, Disposal & Transport 	**Storage** *Description of the product and where and how it is stored*		**Disposal** *Description of the product and where and how it is disposed of*		**Transport** *Description of the product and how it is transported*	
Overall Assessment of Risk of Current Use of the Substance 		**Low** A low-risk score means the substance poses minimal danger under normal working conditions and when proper controls (e.g., PPE, ventilation) are in place. Routine monitoring is sufficient, and there is no immediate concern for harm.		**Medium** A medium-risk score indicates a moderate chance of harm. This suggests that additional precautions or stricter controls may be required to prevent exposure, such as improving handling procedures or enhancing protective measures.		**High** A high-risk score means there is a significant likelihood of harm, either due to the nature of the substance or insufficient controls. Immediate action is required to eliminate or reduce exposure to an acceptable level, such as substituting the substance, upgrading safety measures, or improving training and supervision.
Improvements Required	**Are the current controls effective?**					Yes / No
	Does the MSDS suggest any controls that we don't have in place?					Yes / No
	Is air monitoring considered appropriate?					Yes / No
	Can the process be re-engineered?					Yes / No
	Have we considered the use of an alternative, less dangerous substance?					Yes / No
Assessment Completed by	**Name:**		**Role:**		**Review Date:**	

Insert Safety Data Sheet

Appendix 2 - References

COSHH publications

The Control of Substances Hazardous to Health Regulations 2002
Approved Code of Practice and guidance L5 (sixth edition) HSE Books 2013 ISBN 978 07176 65822

COSHH essentials: Easy steps to control chemicals. Control of Substances Hazardous to Health Regulations HSG193 (Second edition) HSE Books 2007
www.coshh-essentials.org.uk

CLP Regulations

CLP is the abbreviated name for regulations relating to the classification, labelling and packaging of substances which came into effect from June 2015 replacing the old CHIP symbols.

CLP Regulations can be viewed here: https://www.hse.gov.uk/chemical-classification/labelling-packaging/hazard-symbols-hazard-pictograms.htm

Related publications

Biological monitoring in the workplace: Information for employees on its application to chemical exposure Leaflet INDG245 HSE Books 1997 ISBN 978 07176 14509

Biological monitoring in the workplace: A guide to its practical application to chemical exposure HSG167 HSE Books 1997 ISBN 978 07176 12796

EH40/2005 Workplace exposure limits: Containing the list of workplace exposure limits for use with the Control of Substances Hazardous to Health Regulations 2002
EH40 HSE Books 20011 ISBN 978 07176 64467

Monitoring strategies for toxic substances (2nd ed) HSG173 HSE Books 2006
ISBN 978 07176 61886

Respiratory Protective Equipment at work: A practical guide HSG53 (4th Edition) HSE Books 2013 ISBN 978 07176 64524