

Checklist for the Review and Approval of Procedural Documents

To be completed and attached to any document which guides practices when submitted to the appropriate committee for consideration and approval.

	Yes/No/ Unsure	Comments
Title of Document		Control of Substances Hazardous to Health Policy
Could this policy be incorporated within an existing policy?	N	
Does this policy follow the style and format of the agreed template?	Y	
Has the front sheet been completed?	Y	
Is there an appropriate review date?	Y	
Does the contents page reflect the body of the document?	Y	
Are there measurable standards or KPIs to support the monitoring of compliance with and effectiveness of the document?	Y	
Are all appendices appropriate and/or applicable?	Y	
Have all appropriate stakeholders been consulted?	Y	
Has an Equality Impact Assessment been undertaken?	Y	
Is there a clear plan for implementation?	Y	Plan is already implemented, this is just an update
Has the document control sheet been completed?	Y	
Are key references cited and supporting documents referenced?	Y	
Does the document identify which Committee/Group will approve it?	Y	

Plans for communicating policy to – staff; practice membership; public (as appropriate)	Y	Via intranet and weekly newsletter
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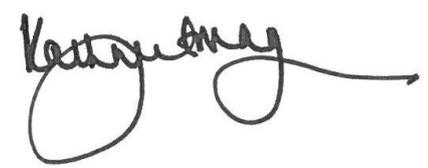
Individual Approval

If you are happy to approve this document, please sign and date it and forward to the chair of the committee/group where it will receive final approval.

Name	Caroline Hall	Date	24 May 2017
Signature			

Committee Approval

If the committee is happy to approve this document, please sign and date it and forward copies to the person with responsibility for disseminating and implementing the document and the person who is responsible for maintaining the organisation's database of approved documents.

Name	Kathryn Magson	Date	24 May 2017
Signature			



CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH POLICY

Version Number	1.4
Ratified By	Exec Team
Date Ratified	Jun 2017
Name of Originator/Author	Amanda Yeates
Responsible Director	Chief Finance Officer
Staff Audience	All Staff
Date Issued	Jun 2017
Next Review Date	Jun 2017

DOCUMENT CONTROL

Plan Version	Page	Details of amendment	Date	Author
1.0		New Plan	Dec 14	AY
1.1	8	Details of the Competent Assessors updated to show they will be the Head of Corporate Support and the Office Manager	Dec 14	AY
1.1	11	Section 5.5.1 location of where the substance is stored added to "point of use"	Dec 14	AY
1.3	6	Date of COSHH Regulations updated in section 2	Sep 15	AY
1.3	7	Regulations applied to hazardous materials updated in section 3.1	Sep 15	AY
1.3	16	COSHH Assessment Form updated to include environment where exposure is likely to occur	Sep 15	AY
1.3	ALL	Numerous sections updated to indicate the requirement for the completion of an inventory for all hazardous substance and full risk assessments only to be completed for those substances considered very hazardous or a significant risk	Oct 15	AY
1.4	9	Section 4.2 updated to include Staff Health & Safety Representative	May 17	AY
1.4	10&13	EH/40 Workplace Exposure limits 2005 update date changed to 2011	May 17	AY
1.4	12	Annual audit of risk registers now includes ensuring substance inventory is up to date	May 17	AY
1.4	13	Date and title of the Health and Safety policy updated	May 17	AY
1.4	19	Updated Equality Analysis Screening Form replaces previous EQIA	May 17	AY

CONTENTS

Section		Page
1.	INTRODUCTION	6
2.	PURPOSE	6
3.	DEFINITIONS	6
4.	ROLES AND RESPONSIBILITIES	7
4.1	Roles and Responsibilities within the Organisation	7
4.2	Consultation and Communication with Stakeholders	8
5.	CONTENT	9
6.	MONITORING COMPLIANCE	12
7.	EDUCATION AND TRAINING	12
8.	REFERENCES	13
9.	ASSOCIATED DOCUMENTATION	13
APPENDIX 1	GLOSSARY	14
APPENDIX 2	PROCESS FOR IDENTIFYING SUBSTANCES HAZARDOUS TO HEALTH	15
APPENDIX 3	COSHH INVENTORY	16
APPENDIX 4	COSHH ASSESSMENT FORM	17
APPENDIX 5	EQUALITIES IMPACT ASSESSMENT SCREENING FORM	19

1.	INTRODUCTION
	Using chemicals or other hazardous substances at work can put people's health at risk. The law requires employers to control exposure to hazardous substances to prevent ill health. The Control of Substances Hazardous to Health (COSHH) policy is Herts Valley's Clinical Commissioning Group (HVCCG) method of properly managing substances hazardous to health used in the workplace. This is the CCG's procedural document to ensure compliance with the COSHH Regulations.
2.	PURPOSE
	<p>Hazardous substances are found in nearly all work environments – for example, factories, shops, construction sites, farms, hospitals, health centres and offices.</p> <p>The COSHH (Amendment) Regulations (2004) require all employers to make an assessment of the risks to health, which arise from exposure to hazardous substances in the work place. As part of this assessment employers must establish what measures are necessary to prevent or adequately control exposure to substances hazardous to health and what further precautions and emergency procedures need to be taken to protect the health of employees. The CCG recognises that the employer must safeguard not only himself and his employees but also anyone not in their employment who may be affected by these activities.</p>
	<p>Specifically excepted from COSHH are:</p> <ul style="list-style-type: none"> • Exposures to lead and asbestos which are covered by the Control of Lead at Work regulations 1980, and the Control of Asbestos at Work Regulations 2012 respectively • Substances that are hazardous solely by virtue of radioactive, explosive or flammable properties or solely because it is at high or low temperature or high pressure. • Substances that are a risk to the health of a person to whom the substance is administered in the course of medical treatment by a registered medical practitioner, registered dentist or appropriate practitioner under section 58 of the Medicine's Act
3.	DEFINITIONS
	The definition of Substances Hazardous to Health is given in COSHH (Amendment) Regulations (2004) and covers virtually all substances capable of causing adverse health effects or disease, arising from work activities.

	<p>There are five identified categories which, summarised, are as follows:</p> <ul style="list-style-type: none"> • Chemicals classified as hazardous for supply under European Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures , known by its abbreviated form, 'the CLP Regulation and displays a hazard symbol • Substances for which the Health and Safety Commission has assigned a Workplace Exposure Level (WEL) • A biological agent, which includes micro-organisms, parasites and microscopic infectious forms of larger parasites • Any dust at a substantial concentration in the air • Any substance not listed above, but because of its chemical or toxicological properties and the way in which it is used or present in the workplace creates a risk to health
<p>3.2</p>	<p>The Royal Society of Chemistry defines a competent person under COSHH as “somebody with the skill, knowledge, practical experience and training to enable him or her to assess the risks arising from work activities involving substances hazardous to health. A competent person should:</p> <ul style="list-style-type: none"> • Understand hazard and risk • Know how work can expose people to substances hazardous to health • Have the ability (and authority) to collect all necessary information • Have the knowledge, skills and experience to make right decisions about how to control exposure”
<p>4.</p>	<p>ROLES AND RESPONSIBILITIES</p>
<p>4.1</p>	<p>Roles and Responsibilities within the Organisation</p>
<p>4.1.1</p>	<p>The Accountable Officer is responsible for ensuring compliance with this policy. To achieve this the Accountable Officer will:</p> <ul style="list-style-type: none"> • Ensure measures are in place for the systematic identification and assessment of risk • Ensure measures are in place for the implementation of effective control measures
<p>4.1.2</p>	<p>The Head of Corporate Support is responsible for:</p> <ul style="list-style-type: none"> • Identifying key staff to receive training and updates in undertaking COSHH assessments • Ensure that all suitable and sufficient risk assessments are carried out on all tasks where exposure to very hazardous materials is likely • Maintain a file containing the current substance inventory, including COSHH assessment records and relevant material safety data sheets

	<p>where appropriate. Ensure that safe systems of work are developed and followed for all activities.</p> <ul style="list-style-type: none"> • Provide employees with information on risks identified together with protective and preventative measures to be adopted, including access to Personal Protective Equipment (PPE) where appropriate.
4.1.3	<p>Line Managers are responsible for:</p> <ul style="list-style-type: none"> • Ensuring that no work is carried out that is liable to expose employees to substances hazardous to health unless a suitable and sufficient assessment of those risks has been carried out and of the steps needed to meet the requirements of the COSHH regulations • Referring any staff who report adverse health effects from working with any hazardous substances to the Occupational Health department
4.1.4	<p>All employees, who are the users of any hazardous materials, should ensure that</p> <ul style="list-style-type: none"> • They report any symptoms arising from their work with materials to their manager • They use and follow all control measures (i.e. ventilation, personal protective equipment) provided in the interests of safety in the manner shown in their training and safe system of work • Assist the competent persons responsible for undertaking any necessary work place assessments
4.1.5	<p>The Competent Persons (Assessor) will be the Head of Corporate Support and the Office Manager and they should:</p> <ul style="list-style-type: none"> • Use the CCG standard assessment process and, in consultation with staff, assess the risks to health • Ensure that any significant risks are recorded on the CCG's risk register • Advise line managers of the results of any risk assessments • Ensure the assessment is reviewed if there is reason to suspect that the assessment is no longer valid or there has been a significant change in the work to which the assessment relates • Where a review indicates that changes are required, these changes will be made • Ensure that any control measures specified are efficiently maintained, are in an efficient state and in good working order • Recommend where specialist advice should be sought and detailed COSHH risk assessments should be carried out.
4.2	Consultation and Communication with Stakeholders

	<p>The following stakeholders have been consulted in relation to this policy</p> <ul style="list-style-type: none"> • HVCCG Exec Team • Public Health • HVCCG Office Manager • Qualified Health and Safety Adviser • Staff Health & Safety Representative
5.	CONTENT
5.1	Regulations
	<p>The COSHH Regulations require the CCG to identify, evaluate and control the risks to health of all their employees from exposure to substances hazardous to health at work (see appendix 2).</p> <p>Before any substance is used in the workplace the competent person shall check to decide whether it is classified as a hazard. In each case where the substance is recognised as a hazard the competent person shall seek from the suppliers the Material Safety Data Sheet (MSDS) which gives the main source of information about the substance and how to properly manage it, so as to safeguard the health of staff and visitors.</p> <p>These data sheets are not sufficient in themselves to be a risk assessment in their own right, as they do not include information on the particular circumstances of use, control, emergency, or disposal arrangements. In addition, although the MSDS can tell you about the potential risks, it will not inform you who is at risk, or how these risks should be controlled. Therefore, a full risk assessment should be completed where a substance is deemed to be very hazardous or present a significant risk (see appendix 4 for the COSHH assessment form).</p>
5.2	Risk Assessments
5.2.1	<p>To comply with COSHH Regulations, these steps will need to be followed:</p> <ul style="list-style-type: none"> • Assess the risks to health from hazardous substances used, created or stored in the workplace, or used as part of work activities and record these on the COSHH inventory (see appendix 3), attaching a copy of the relevant MSDS sheet For those substances deemed to present a “significant” risk, or very hazardous, a full risk assessment should be completed (appendix 4): • Determine what precautions are needed. Work must not be carried out which could expose people to hazardous substances without first assessing the risks and necessary precautions, and establishing what else is needed to comply with the COSHH Regulations • Prevent or adequately control exposure. People must be

	<p>prevented from being exposed to hazardous substances. Where preventing exposure is not possible, then exposure must be adequately controlled</p> <ul style="list-style-type: none"> • Ensure that all control measures are implemented and maintained properly and that safety procedures are followed • Monitor the exposure of persons to very hazardous substances, if necessary • Carry out appropriate health surveillance where a full risk assessment has shown this is necessary or where the COSHH regulations set specific requirements • Prepare plans and procedures to deal with accidents, incidents and emergencies involving hazardous substances • Ensure all persons are properly informed, trained and supervised at all times • Monitor and review the effectiveness of risk assessments on a regular basis and review as necessary
<p>5.2.2</p>	<p>Risk assessments should identify all products that are <u>classified as being</u> very hazardous and thought to be of significant risk, e.g. particularly toxic, or corrosive substances. Such information must be clearly displayed on the bottle or packaging and included on the COSHH assessment sheet (appendix 4) as well as giving details of:</p> <ul style="list-style-type: none"> • How to safely use the product • How to store the product safely • The Personal Protective Equipment (PPE) that should be worn • The first aid treatment to be given • Any spill control and disposal requirements <p>The storage of hazardous products is extremely important. Advice should be taken from the MSDS. Flammable and highly flammable liquids should be stored in metal cabinets away from heat or direct sunlight.</p> <p>Storage areas should be well ventilated and cool. Low level storage should be used wherever possible with hazardous products well segregated. The quantity of substances stored should always be kept to a minimum.</p> <p>Any specific requirements for PPE to be worn should be clearly stated on the COSHH assessment sheet. All PPE should be stored correctly and all defects must be reported immediately.</p> <p>The HSE publication EH/40 Workplace Exposure Limits 2005 (as updated 2011) is another important source of information for completing the risk assessment. Whilst this publication is not essential to carry out COSHH assessments, it may provide additional information to enhance the</p>

	comprehensiveness of the assessment.												
5.3	Hierarchy of Controls												
	<p>The COSHH regulations require you to choose the highest reasonably practical level of protection in the following hierarchy. The further you go down the list, the less effective the control measures are likely to be, and it will be necessary to do more and more to reduce the exposure.</p> <table border="1"> <thead> <tr> <th>Control</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>Elimination</td> <td>Stop using the substance or process</td> </tr> <tr> <td>Substitution</td> <td>Use a less hazardous substance</td> </tr> <tr> <td>Engineering</td> <td>Provide local exhaust or dilution ventilation</td> </tr> <tr> <td>Administrative</td> <td>Limit duration of exposure</td> </tr> <tr> <td>PPE</td> <td>Provide gloves or other protective equipment</td> </tr> </tbody> </table>	Control	Comment	Elimination	Stop using the substance or process	Substitution	Use a less hazardous substance	Engineering	Provide local exhaust or dilution ventilation	Administrative	Limit duration of exposure	PPE	Provide gloves or other protective equipment
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5.4	Carrying out the Assessment												
	<p>The following areas should be fully covered when carrying out COSHH risk assessments:</p> <ul style="list-style-type: none"> • Assessing exposure and persons at risk • Assigning controls • First aid measures and fire precautions • Spillage and disposal requirements 												
5.5	Implementation												
5.5.1	<p>Those responsible for working with the substance must be informed about any hazards and controls. The key steps are:</p> <ul style="list-style-type: none"> • Make copies of the assessments available at the point of use/location where the substance is stored • Ensure everybody is told about the substances, the risks involved and how they are going to be controlled • If there is a potential conflict , say with glove materials, then advise how you are going to overcome this 												
5.5.2	<p>If there is a phasing to the controls, e.g. PPE first, then local exhaust ventilation, ensure that those persons exposed are informed that this is what should happen.</p>												
5.5.3	<p>It may be that when carrying out a risk assessment, a requirement is identified to carry out a health check, say for dermatitis. In such instances a health surveillance system should be established in conjunction with Occupational Health, and the findings recorded. An investigation to</p>												

	determine what is going wrong if adverse effects are identified should be instigated immediately and method of work changed accordingly. An example Health Surveillance Form is included within the appendices.
5.5.4	<p>The controls being used for a substance should be periodically reviewed to establish whether:</p> <ul style="list-style-type: none"> • storage and use precautions are being followed • any others are at risk • engineering controls are being maintained • specified PPE is being used • there are conflicts in PPE that come from other substances • PPE impedes operations or introduces other risks
6.	MONITORING COMPLIANCE
	<p>The Head of Corporate Support will be responsible for the monitoring and review of this policy.</p> <p>Key Performance Indicators which could be used to monitor effectiveness are as follows:</p> <ul style="list-style-type: none"> • Number and type of adverse incidents • Number and type of Serious Untoward Incidents • Results of Health and Safety Audits • Annual audit of risk registers to ensure all significant COSHH risks are included and substance inventory is up to date.
7.	EDUCATION AND TRAINING
7.1	<p>Employees exposed to substances very hazardous to their health will be provided with such information, instruction and training, as is suitable for them to know the risks to their health created by their exposure to substances with which they work. They will also be advised of the precautions necessary for their protection.</p> <p>The Head of Corporate Support and the Office Manager will receive more specific COSHH training which includes undertaking appropriate risk assessments.</p>
7.2	<p>The CCG shall ensure that staff who may be exposed to hazardous substances receive information, instruction and training on the following:</p> <ul style="list-style-type: none"> • Suitable and sufficient information about the substance (e.g. its storage, safe use, control and disposal) • Suitable and sufficient information about the risks to their health

	<p>created by exposure to the substance(s) and the precautions which should be taken to control them.</p> <ul style="list-style-type: none"> • The information mentioned above will include information on the results of any monitoring of exposure at the work place and, in particular, in the case of any substance allocated a Workplace Exposure limit (WEL). • In addition, appropriate training will be provided for those nominated to be “competent person(s)” to ensure that they meet the definition described in section 3.2
8.	REFERENCES
	<ul style="list-style-type: none"> • HSE The Control of Substances Hazardous to Health (Amendment) Regulations 2004 • EH40. Occupation Exposure Limits. HSE (Revised 2011) • HSE Guidelines HS(G)27 Substances for use at work • HSE COSHH – A brief guide to the Regulations INDG 136 rev 2 • Control of substances hazardous to health (Fourth Edition) Approved Code of Practice and Guidance. HSE.
9.	ASSOCIATED DOCUMENTATION
	<ul style="list-style-type: none"> • HVCCG Health and Safety Policy and Strategy December 2016 • COSHH Inventory • Material Fact Data Sheets

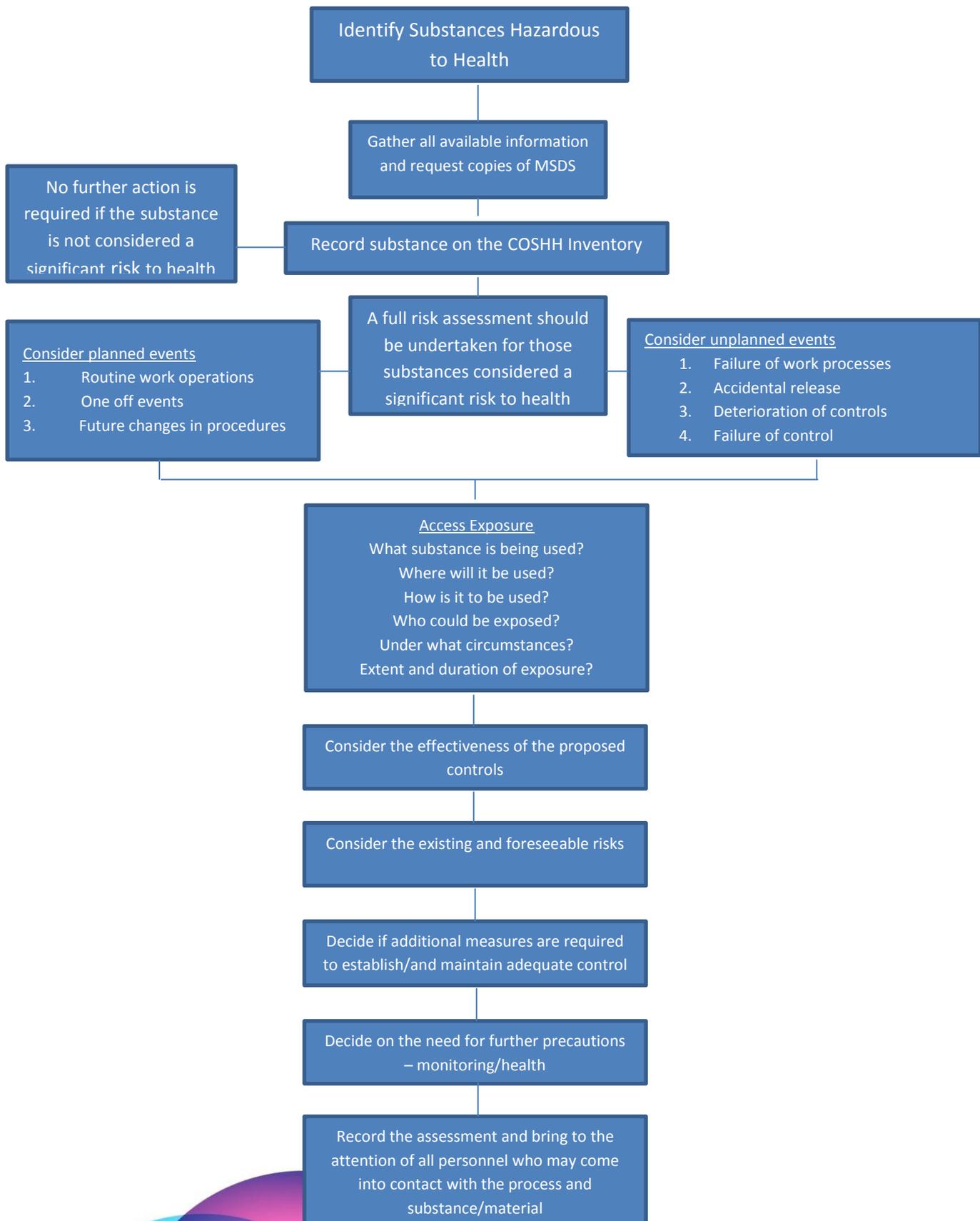


APPENDIX 1 – GLOSSARY

CCG	Clinical Commissioning Group
COSHH	Control of Substances Hazardous to Health
HSE	Health and Safety Executive
HVCCG	Herts Valleys Clinical Commissioning Group
MSDS	Material Safety Data Sheet
PPE	Personal Protective Equipment
WEL	Workplace Exposure Level



APPENDIX 2 – PROCESS FOR IDENTIFYING SUBSTANCES HAZARDOUS TO HEALTH



APPENDIX 4 –COSHH ASSESSMENT FORM

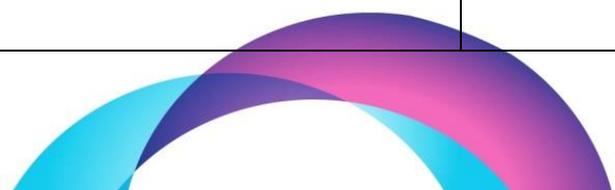
COSHH ASSESSMENT FORM

Product Name(s):		COSHH Assess. No:	
Description of Substance:	What is the purpose of the substance, what is it used for?	Assessed By:	
MSDS Attached	Yes/No	Date:	
Nature of the Hazard:	What are the risks?	Manufacturers Name and Address:	
Possible Routes of Exposure:	Ingestion (oral) <input type="checkbox"/> Absorption (through the skin) <input type="checkbox"/> Inhalation (breathing in) <input type="checkbox"/>	Specific task(s) and environment where exposure is likely to occur	
Quantity of substance likely to be used at any one time		Persons at Risk:	Description of who might be at risk e.g. users, other employees, visitors, contractors – including approximate numbers this should consider any specific individual factors which may increase risk –e.g. pre-existing health conditions , pregnancy etc
Potential duration, frequency and level of exposure		Workplace Exposure Limits:	See HSE Guidance “Occupational Exposure Limits” EH40
Storage Requirements		Disposal Requirements	

SUBSTANCE PROPERTIES

								
Yes/No	Yes/No	Yes/No						

Existing Control Measures (including any Personal Protective Equipment required)	What is currently done to prevent or adequately control exposure to the substance?
Additional Control Measures Required (including any Personal Protective Equipment Required)	<i>Remember: personal protective equipment (PPE) should be the last control method as it is the most likely to fail</i>
Maintenance and Supervision	How will proper use of control measures be maintained and ensured?



Monitoring Requirements	How will proper use of control measures be monitored? Will health Surveillance be required?
Emergency Plans	Consider required procedures in the event of: <ul style="list-style-type: none"> • Loss of control measures • Spillages and leaks • Fire fighting/Evacuation Procedures • Raising the alarm • Non-availability of Personal Protective Equipment
Instruction and Training	How will employees and other people be advised of the health risks and appropriate precautions if they may be exposed to the substance?
Review Requirements	When is a review necessary? What will be reviewed?

Appendix 7 - Equality Analysis - Equality Impact Assessment Screening Form

Very occasionally it will be clear that some proposals will not impact on the protected equality groups and health inequalities groups.

Where you can show that there is no impact, positive or negative, on any of the groups please complete this form and include it with any reports/papers used to make a decision on the proposal.

Name of policy / service	COSHH Policy
What is it that is being proposed?	The COSHH (Amendment) Regulations (2004) require all employers to make an assessment of the risks to health, which arise from exposure to hazardous substances in the work place. As part of this assessment employers must establish what measures are necessary to prevent or adequately control exposure to substances hazardous to health and what further precautions and emergency procedures need to be taken to protect the health of employees. The CCG recognises that the employer must safeguard not only himself and his employees but also anyone not in their employment who may be affected by these activities.
What are the intended outcome(s) of the proposal	Using chemicals or other hazardous substances at work can put people's health at risk. The law requires employers to control exposure to hazardous substances to prevent ill health. The Control of Substances Hazardous to Health (COSHH) policy is Herts Valley's Clinical Commissioning Group (HVCCG) method of properly managing substances hazardous to health used in the workplace. This is the CCG's procedural document to ensure compliance with the COSHH Regulations.
Explain why you think a full Equality Impact Assessment is not needed	This is an internal policy, the sole purpose of which is to ensure that legislation already in place is followed.
On what evidence/information have you based your decision?	See the relevant legislation listed in the final section of the policy.
How will you monitor the impact of policy	See section 6 of the policy

or service?	
How will you report your findings?	See section 6 of the policy

Having considered the proposal and sufficient evidence to reach a reasonable decision on actual and/or likely current and/or future impact I have decided that a full Equality Impact Assessment is not required.	
Assessors Name and Job title	Amanda Yeates, Head of Corporate Support
Date	18 May 2017

