

Control of Substances Hazardous to Health Policy

Department / Service:	Health & Safety	
Originator:	Paul Graham	Health & Safety Manager
Accountable Director:	Director of People and Culture	
Approved by:	TLG	
Date of Approval:	January 2018	
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This is the most current document and should be used until a revised version is in place		
Target Organisation(s)	Worcestershire Acute Hospitals NHS Trust	
Target Departments	All	
Target staff categories	All	

Worcestershire Acute Hospitals NHS Trust acknowledges that they have a duty to protect their staff, patients and others who may be exposed, by direct contact, airborne contact or other method of contamination, to hazardous substances. The Control of Substances Hazardous to Health Regulations 2002 defines hazardous substances as "all substances with the potential to cause harm by chemical or biological properties". They are regulations of a prohibitive nature, in that work, which may result in exposure to a hazardous substance, is prohibited until a "suitable and sufficient" assessment of risk has been undertaken. The Trust will also assess any risks relating to a hazardous substance that may need to comply with the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002. This policy sets out the Trust's arrangements to ensure compliance with the above regulations.

Key amendments to this Document:

Date	Amendment	By:
01/06/09	Biennial review with minor changes	Paul Graham
16/10/09	Document approved by workforce & organisation development committee	
21/09/11	Biennial review with minor changes	Paul Graham
13/01/12	Document approved at JNCC	
11/12/13	Biennial review with minor changes and the inclusion of the DSEAR	Paul Graham
March 2016	Document extended for 12 months as per TMC paper approved on 22 nd July 2015	TMC

Nov 17	Biennial review with minor amendments resulting from changes to Governance structure	Paul Graham
Jan 20	Document extended for 12 months whilst in the process of appointing a new Health and Safety Manager.	Samantha Reid

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1. Introduction

Worcestershire Acute Hospitals NHS Trust will ensure that no work which is liable to expose staff or any other person to substances hazardous to health shall be undertaken until an assessment has been made to evaluate the risks to health arising from the work. The Trust will ensure that such assessments are carried out and that all reasonable steps are taken to ensure that exposure is either prevented or at least controlled to within statutory limits and where appropriate that any fire and explosive risks associated with dangerous substances are considered. Where exposure cannot be adequately controlled by engineering means, appropriate personal protective equipment (PPE) will be provided. All staff will be provided with comprehensible information and instruction on the nature and likelihood of their exposure to substances hazardous to health.

The implementation of this policy requires the co-operation of all members of staff and management.

2. Scope of the Policy

This policy applies to all staff in all work areas across the Trust. It will also apply to all contractors whilst working on site.

3. Definitions

Hazardous substances: all substances with the potential to cause harm by chemical or biological properties which can include:

- substances used directly in work activities (e.g. adhesives, paints, cleaning products and anaesthetic agents);
- substances generated during work activities (e.g. fumes from Antichlor tablets);
- naturally occurring substances (e.g. grain, dust, latex);
- biological agents such as bacteria and other micro-organisms.

Dangerous Substances: Dangerous substances are any substances used or present at work that could, if not properly controlled, cause harm to people as a result of a fire or explosion. They can be found in nearly all workplaces and include such things as solvents, paints, varnishes, flammable gases, such as liquid petroleum gas (LPG), dusts from machining and sanding operations and dusts from foodstuffs.

4. Responsibility and Duties

The Chief Operating has overall responsibility for health and safety. He/she will delegate certain tasks to responsible managers.

4.1 Management Duties

Managers responsible for work areas storing and/or using hazardous substances or work activities involving the use of hazardous substances must:

- Advise the Trust Health and Safety Manager or Fire Safety Advisor on any substance that they introduce into the work place that could result in exposure and/or fire and explosion. (See Appendix 1)
- Ensure that all staff receive the necessary information and appropriate training on the nature of any hazardous/dangerous substances with which they are working and keep them informed about any monitoring and health surveillance.

- Ensure that following an assessment of the need and appropriateness of using PPE that any necessary equipment is provided and used. (See Section 5.4)
- Ensure that all PPE is maintained according to manufacturer's instructions.
- Ensure that appropriate training is provided for staff that are required to wear items of PPE.
- Ensure that all staff or others who may work in the affected area are informed of the purpose and safe operation of all engineering controls.
- Ensure that in their area of responsibility they hold or have access to an inventory of all substances hazardous to health together with appropriate safety information i.e. Material Safety Data Sheets and COSHH Assessment Records.
- Ensure that all engineering controls are properly maintained and monitored to ensure their effectiveness.
- Ensure that where there are fire and/or explosion risks the work area is free from any sources of ignition (Advice can be sought from the Trust Fire Safety Advisor).
- Ensure that all changes to control measures and changes of PPE are properly assessed and no new substances are introduced into the workplace without prior permission from the Health and Safety Manager.
- Ensure where necessary staff attend for the relevant health surveillance checks as described in the COSHH Risk Assessment.
- Ensure that where necessary adequate procedures are in place to effectively deal with any spillages.
- Ensure that staff have access to and are familiar with any Waste Disposal protocols appropriate to any hazardous substances used within the work area(s).

4.2 Staff Duties

Staff must ensure that they:

- Take personal responsibility for their own health & safety and that of others in complying with this policy
- Report any shortfalls with either the protection methods or safe systems of work.
- Check and wear any necessary PPE.
- Report any accidents, incidents or ill health relating to the use of hazardous substances to your supervisor/line manager.
- Attend any necessary health surveillance checks as detailed in the risk assessment.
- Attend any necessary training provided by the Trust.
- Follow any Waste Disposal protocols appropriate to any hazardous substances used within the work area(s).

5. Policy Detail

5.1 Risk Assessment

The Trust's Health and Safety Manager is the appointed competent person who will carry out risk assessments of exposure to substances hazardous to health and advise on the level of control. (Appendix 2)

The Fire Safety Advisor will advise on any issues associated with dangerous substances as defined in the DSEAR. Where necessary a separate risk assessment will be carried out in order to comply with DSEAR.

In order to obtain a relevant COSHH Assessment for any substance a copy of a completed COSHH Notification Form (See Appendix 1) and the current Material Safety Data Sheet (obtainable directly from the manufacturer or supplier) should be forwarded to the Health and Safety Manager. He will use the information to generate a suitable COSHH Assessment for the work activity which will be added to Datix.

A copy of the COSHH Assessment Form will be returned to the originator who should then implement any necessary control measures.

5.2 Risk Reducing Measures

The Responsible Manager (see Sec 4.1) must take the following steps to minimise the risk of exposure.

1. Ensure that hazard information, e.g. Safety Data Sheet, is kept up to date.
2. Ensure assessments are reviewed annually and re-assessed at least every three years or when any significant changes are made
3. Ensure that staff are trained in the nature of the hazards and the use of control measures
4. Ensure that control measures are maintained and monitored
5. Ensure that all documentation is comprehensive and comprehensible
6. Ensure that the interactions of component chemicals and resultants are considered prior to any mixing
7. Ensure that staff report faults and problems immediately upon discovery
8. Ensure that adequate spillage procedures are in place

5.3 Health Surveillance

The Occupational Health Department will either carry out or arrange for appropriate health surveillance where the need is indicated by the COSHH risk assessment.

5.4 Personal Protective Equipment

The Responsible Manager (See Sec 4.1) will provide personal protective equipment 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. The Trust will in consultation with staff and their representatives:

- Carry out an assessment of proposed PPE to determine suitability.
- 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 correct storage of the PPE

- Implement steps for the maintenance, cleaning and repair of the PPE
- Train 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 staff of the risks which exist
- Reassess as necessary if substances used or work processes change

Where a problem arises in the use of PPE the member of staff must inform their manager/supervisor immediately. Where a member of staff raises a concern related to health and safety in the use of PPE, the Trust will take all necessary steps to investigate the circumstances and where appropriate any corrective measures. The use of PPE is an important means of controlling risks involved in various work activities. PPE is only effective in protecting the wearer or user where the following steps are taken:

1. Only use PPE in accordance with the manufacturer's instructions and only for activities it is designed to provide protection for.
2. Only use PPE if fully trained in its safe use
3. Store, clean, repair and maintain PPE correctly, replacing any items which have been damaged and are no longer serviceable.

Advice can be obtained from the Health and Safety Manager.

5.5 Spillages

Where there is a risk of spillage the responsible manager for the work area must ensure that adequate preventative and precautionary measures are in place to reduce the risk of unnecessary exposure. This will include the need to provide a suitable spill kit which can be used to effectively deal with any potential spill situation. The spill kit should ideally be located in an adjacent room or cupboard and not in the room where the substance is handled and/or stored. This will allow for immediate evacuation and subsequent re-entry to occur following a period of maximised ventilation and with the individual wearing the correct level of protection. Advice can be obtained from the Health and Safety Manager. All spillages must be reported via the Incident Reporting System. Other chemical emergency exposure situations are covered in Appendix 3.

5.6 Record Keeping

The Trust will hold and maintain the following records:

- An inventory of hazardous/dangerous substances (held by H&S Manager and local manager)
- Assessments on the risks of exposure including the control measures provided for staff. (held by H&S Manager and accessible via Datix)
- Details of any examination, testing and repairing of control measures will be kept for a minimum of 5 years. (held by Estates Departments)
- Results from any exposure monitoring used to identify background exposure or proof of adequate levels of control will be kept for 5 years. Results from the monitoring of individuals who may be exposed will be kept for 40 years. (held by H&S Manager)
- Details of any training given to staff relating to the safe use of hazardous substances. (held by H&S Manager and local manager)

6 Implementation arrangements

6.1 Plan for implementation

This policy will be implemented by local managers in their respective areas of responsibility.

6.2 Dissemination process

This Policy will be made available on the Trust Intranet. A Managers Brief will be distributed to all managers for them to in turn inform their staff of the relevant sections of the policy. It will also be communicated to managers and staff-side representatives via the Trust Health and Safety Committee. All staff will be made aware of this policy via the Trust's local induction process.

6.3 Training and awareness

The Trust will ensure that the appropriate members of staff are suitably trained in safe work with hazardous substances as identified in the Trust Training Matrix. In house training is provided by the Health and Safety Manager and the Infection Control Team.

7 Monitoring and compliance

The Health & Safety Manager will monitor the effectiveness of this policy as part of the Health & Safety Audit Programme. Divisions will be responsible for receiving and monitoring audit reports and taking any necessary actions to ensure full compliance.

The Policy will be reviewed by the Health and Safety Committee two years from the date of approval, unless any statutory or national guidance is introduced in the intervening period that requires revision of the document before the planned review.

9. Policy review

This policy will be reviewed after 2 years

10. References

References:

Code:

Health and Safety at Work, etc Act 1974	
Management of Health and Safety at Work Regulations 1999	
Control of Substances Hazardous to Health Regulations 2002	
Provision and Use of Personal Protective Equipment Regulations 1992	
Dangerous Substances and Explosive Atmospheres Regulations 2002	
Infection Control Policy	
Waste Management Policy	
Health and Safety Strategy	
Risk Assessment Procedure	
Manual Handling Policy	

11. Background

10.1 Equality requirements

An equality assessment has been performed. There are no equality issues presented by this policy.

10.2 Financial Risk Assessment

A financial risk assessment has been performed. Effecting change as a result of learning may have associated costs although these will be dealt with through individual business cases.

10.3 Consultation Process

The following were consulted in the production of this version of the policy:

- Policy Working Group
- Members of the Health and Safety Committee

10.4 Approval Process

This policy will obtain final approval from KDAG.

Appendix 1

COSHH NOTIFICATION FORM

Please answer all questions

Your Full Name:	Tel. No.	Date:	Ward/ Department/ Hospital:
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Trade name or name of substance	Supplier/ Manufacturer address and phone number
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MATERIAL USAGE INFORMATION

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How much of the substance is used in one day (approx)?

How long are staff/ others exposed to the substance in one day?

<30 mins 30 mins – 2 hours 2-4 hours 4-8 hours over 8 hours longer (specify)

Where is the substance used? (please indicate)

Outside <input type="checkbox"/>	Inside well ventilated <input type="checkbox"/>	Inside poorly ventilated <input type="checkbox"/>
Confined space <input type="checkbox"/>	Other (please specify) <input type="checkbox"/>	

Please give as much information as possible

<p>Work Practice information i.e. diluting; hand applying; brushing; spraying etc.</p>	<p>Existing control measures i.e. fume cabinet; local extraction; ventilation etc</p>
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<p>Personal protective equipment (PPE) What type, make and grade of PPE is currently in use? i.e. gloves; goggles; masks etc.</p>	<p>Details of any sources of ignition (applicable only to Dangerous substances where there is a risk of fire and/or explosion)</p>
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Occupations of exposed staff	Numbers	Descriptions of others exposed	Numbers

Any other relevant information:

Please keep a copy for your record and send this form together with a copy of the Material Safety Data Sheet to the Trust Health and Safety Manager. In return you will receive a copy of the COSHH Assessment relating to the named substance.

Appendix 2

**CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH
 ASSESSMENT FORM**

Name of Hazardous Substance:
Where is the substance used:
How is the substance used: (Refer to the Notification Form)
A. Identified HAZARDS
<p>Main Hazards: (Refer to the hazards on label or in Sections 2 or 15 of the Material Safety Data Sheet - MSDS)</p> <p> <input type="checkbox"/> Health hazard <input type="checkbox"/> Corrosive <input type="checkbox"/> Acute Toxicity <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Respiratory Sensitiser/Carcinogen <input type="checkbox"/> Other Briefly describe:</p> <p><i>Workplace Exposure Limit:</i> (where applicable)</p>
List any other hazardous properties here e.g. biohazard, flammable, cryogenic etc.
B: Assessment of RISK
<p>Identify how exposure may occur: (i.e. Methods of entry)</p> <p> <input type="checkbox"/> Ingestion <input type="checkbox"/> Inhalation <input type="checkbox"/> Skin Absorption <input type="checkbox"/> Skin local effect <input type="checkbox"/> Injection <input type="checkbox"/> Sensitisation</p>
<p>Person(s) affected by exposure:</p> <p>Person(s) (individuals or groups) Sex (Male/Female) Numbers</p> <p>Others <input type="checkbox"/> Patients <input type="checkbox"/> Visitors <input type="checkbox"/> Contractors</p> <p>Details of any susceptible groups:</p>
<p>Frequency of exposure:</p> <p> <input type="checkbox"/> More <input type="checkbox"/> Hourly <input type="checkbox"/> Daily <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Less</p>
<p>Potential Health Effects:</p> <p>Likelihood of ill health: <input type="checkbox"/> Probable <input type="checkbox"/> Possible <input type="checkbox"/> Negligible</p> <p>Severity of ill health <input type="checkbox"/> Serious effects <input type="checkbox"/> Significant effects <input type="checkbox"/> Minor effects</p>

Level of Risk: <input type="checkbox"/> LOW <input type="checkbox"/> MEDIUM <input type="checkbox"/> HIGH
C. Required CONTROLS
<p>What controls are in place? (Refer to precautions on label or Section 2 or 15 of the MSDS.)</p> <ul style="list-style-type: none"> <input type="checkbox"/> General ventilation <input type="checkbox"/> Local Exhaust Ventilation (LEV) <input type="checkbox"/> Personal protective equipment (PPE) <input type="checkbox"/> Other. Briefly describe: <p>NOTE: If using materials where health surveillance is required or the process generates significant hazardous fumes requiring atmospheric monitoring, record it here:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Health surveillance required <input type="checkbox"/> Atmosphere monitoring required <p>Briefly describe requirements:</p>
D. MAINTENANCE of Controls
<p>How are the controls maintained? (List maintenance, such as log book entries for respirator checks, service records of exhaust ventilation systems, etc.)</p> <p>Controls are functioning properly <input type="checkbox"/> YES <input type="checkbox"/> NO Explain reasons:</p>
E. ELIMINATION/SUBSTITUTION of the hazardous substance
<p>Record actions you can take if any (Check and confirm that no new risks will be introduced)</p>
F. Are ADDITIONAL CONTROLS required?
<p>What else is necessary? (List additional actions e.g. training on control measures, improve ventilation, etc)</p>
G. EMERGENCY PROCEDURES
H. DISPOSAL PROCEDURE

Appendix 3

DEALING WITH CHEMICAL/BIOLOGICAL THREATS BY POST

Terrorist or criminal incidents of this nature are extremely rare. However, if there is a concern that a suspect chemical / biological package has been received, sensible steps can be taken to minimise exposure to risk and the possibility of harm. The overall message to the business community is to remain calm.

The first indication that a chemical / biological incident may have occurred could be:

- A suspicious object.
 - A strong smell of noxious fumes.
 - Groups of people suddenly feeling unwell / collapsing
 - Groups of people experiencing sudden skin blisters.*
- AND
- There is no obvious explanation evident e.g. accidental chemical tanker spillage or nearby factory etc.

** Not all blister agents cause immediate blistering upon contact with the skin*

Preparing for the Possibility

Planning for the delivery of chemical / biological materials by post is based on two features:

- it will already have undergone some fairly rough handling by the Post Office
- the package is designed to reach its intended target

Minimising the Risk of a Successful Attack

The following practical steps can be taken:

- review your procedures for dealing with all mail.
- have one dedicated area for the receipt of incoming mail
- check all mail for suspicious signs
- if equipment is available, scan or x-ray all mail if you perceive that your business is at risk from contaminated mail, you may wish to consider:
 - using a letter opener and avoid spilling any contents
 - having protective equipment available for staff e.g. latex gloves and dust masks
 - having airtight containers available for the deposit of such packages

What to Look For

The following criteria may assist in assessing the threat:

Who is involved?

- Recipient - VIP target
- Witnesses

- Victims

What is involved?

- Nature of suspicious item
- Where has it come from?
- How did it get there?
- Has it been packaged to reach the venue?
- Is it unsolicited?
- Have enquiries been made of its origin / sender

Why is there suspicion?

- Who says it is suspicious
- Are there any previous similar reports
- Is there a connected threat/demand

Dealing with Suspected Contaminated Packages

Contaminated package received through the post

- place the package in a sealed bag or container
- shut windows in the room
- evacuate the room, closing the door switch off the air conditioning system
- notify police immediately using the 999 system
- report to line manager or manager on-call

In addition to the above, consider the following action if any material may have been released in the building

- close all fire doors
- close all windows in the rest of the building
- evacuate the building - where evacuation is not possible, for example where the evacuation route is through the contaminated area, move staff away from the hazard and await instructions from the emergency services

Contaminated package outside the building

- switch off the air conditioning system
- close all fire doors and close all windows in the building
- move all occupants away from the hazard and await instructions from the emergency services
- notify the police immediately using the 999 system clearly stating why you believe a chemical / biological material is involved.

Persons exposed to chemical / biological material

- do not over react
- do not touch your eyes, nose or any other part of your body
- wash hands in soapy water
- keep all persons finding and exposed to the material separate from others and available for medical attention
- try to ascertain how many people may have been exposed - keep a record Including details of their family doctor
- people should be encouraged to stay calm and remain near the scene for further specialist treatment and advice.

Supporting Document 1 - Equality Impact Assessment Tool

To be completed by the key document author and attached to key document when submitted to the appropriate committee for consideration and approval.

	Title of document	Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	• Race	No	
	• Ethnic origins (including gypsies and travellers)	No	
	• Nationality	No	
	• Gender	No	
	• Culture	No	
	• Religion or belief	No	
	• Sexual orientation including lesbian, gay and bisexual people	No	
	• Age	No	
	• Disability	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4.	Is the impact of the policy/guidance likely to be negative?	No	
5.	If so can the impact be avoided?	N/A	
6.	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	

If you have identified a potential discriminatory impact of this key document, please refer it to Head of Human Resources, together with any suggestions as to the action required to avoid/reduce this impact.

For advice in respect of answering the above questions, please contact Head of Human Resources.

Supporting Document 2 - Financial Risk Assessment

To be completed by the key document author and attached to key document when submitted to the appropriate committee for consideration and approval.

	Title of document:	Yes/No
1.	Does the implementation of this document require any additional Capital resources	NO
2.	Does the implementation of this document require additional revenue	NO
3.	Does the implementation of this document require additional manpower	NO
4.	Does the implementation of this document release any manpower costs through a change in practice	NO
5.	Are there additional staff training costs associated with implementing this document which cannot be delivered through current training programmes or allocated training times for staff	NO
	Other comments: Topical negative pressure or Vacuumed Assisted Closure has been used within the Trust for many years. Implementation of the guideline should contribute to ensuring cost-effective use	N/A

If the response to any of the above is yes, please complete a business case and which is signed by your Finance Manager and Directorate Manager for consideration by the Executive Team before progressing to the relevant committee for approval.