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**Control of Substances Hazardous to Health**

**(COSHH) Policy**

**November 2023**

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 **The on-line version is the only version that is maintained. Any printed copies should, therefore, be viewed as ‘uncontrolled’ and as such may not necessarily contain the latest updates and amendments.**

**AMENDMENTS**

Amendments to the policy may be issued from time to time. A new amendment history will be issued with each change.

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# Introduction

For the purposes of this policy Humber and North Yorkshire Integrated Care Board (ICB) will be referred to as 'the ICB'.

The Control of Substances Hazardous to Health Regulations 2002 (as amended) covers all substances, materials, chemicals, etc used in the workplace that may be considered hazardous to a person’s health. This includes all substances that can enter the human body through inhalation, absorption, digestion, through an open wound or puncture injury.

It is the statutory duty of the employer to take all reasonable and practical steps to reduce the risk from hazardous substances to its employees, and anyone else who may be affected by their work activities, keeping it to a minimum. Where this is not possible the employer must provide and maintain suitable control measures, including Personal Protective Equipment.

It is the statutory duty of employees to comply with health and safety legislation and any other procedures and policies that are designed to protect them from the risks associated with hazardous materials.

# Purpose

Humber and North Yorkshire integrated Care board (HNY ICB) will take all reasonable and practical steps to protect staff, patients, visitors, and contractors from all substances hazardous to health that may be used in their work-based activities.

This Procedure provides an overview of the Control of Substances Hazardous to Health within HNY ICB.

The objective of the Control of Substances Hazardous to Health (COSHH) risk assessment process is to ensure that exposure to hazardous substances is prevented or adequately controlled in compliance with the Control of Substances Hazardous to Health Regulations 2002 (as amended) and associated Approved Codes of Practice.

# Scope

This policy applies to all employees of the ICB, any staff who are seconded to the ICB, contracted and agency staff and any other individual working on ICB premises.

This policy applies to all ICB premises whether owned or leased, and forms part of the overall risk management strategy.

To this end, this policy will be available and or circulated to representatives of tenant and contractor organisations, as necessary.

# Implementation

This policy will be available to all staff for use via the ICB Internet.

All managers are responsible for ensuring that relevant staff within the ICB have read and understood this document and are competent to perform their duties in accordance with any procedures described.

# Executive Director for Corporate Affairs

 The Executive Director of Corporate Affairs has the overall responsibility to ensure that HNY ICB complies with all relevant health and safety legislation. Specific duties include:

* Provide reports/feedback, where appropriate, to the Board or ICB H&S meeting on all matters relating to the Control of Substances Hazardous to Health.

* Ensure that the Health and Safety responsible and Competent staff manages the COSHH systems on a day-to-day basis.

* Receive reports on any audits of the COSHH system by the Health and Safety Lead and ensure that, if appropriate, recommendations are acted upon, and corrective actions are taken.

## Health and Safety Lead

The Health and Safety Lead has responsibility for the ongoing management of the COSHH system in conjunction with HNY Responsible and Competent staff identified. Specific duties include:

* Ensure local Maintenance of the completed risk assessment records.

* Ensure a Review of completed assessments to ensure that they have been completed in accordance with this procedure and provide guidance as necessary to the authorised COSHH Assessors.

* Ensure the COSHH system is audited on a regular basis and provide a report to the health and safety Lead on such audits.

* Provide information, instruction, and training for the designated COSHH Assessors and maintain a list of said assessors.

* Review and update this procedure on a regular basis to ensure it meets regulatory requirements, and the requirements of HNY ICB Health and Safety Policy.

## COSHH Assessor (Undertaken by HNY ICB Responsible and Competent staff)

The COSHH Assessor(s) have responsibility for the ongoing assessment of the COSHH substances used within the HNY ICB buildings and functions. Specific duties include:

* Ensure that COSHH risk assessments are completed for all activities identified within their assigned area of control which may involve exposure to substances hazardous to health.

* Ensure that completed assessments are kept local for inclusion in the assessment records.

* Ensure that completed assessments are reviewed as required.

* Maintain local copies of all COSHH assessments that are relevant to the activities being performed within their area of responsibility.

* Ensure that the findings of COSHH assessments are communicated to those who may be affected by the activity.

* Perform local checks for compliance with COSHH assessments i.e., use of control measures, including PPE.

# All Staff

It is the duty of all staff and any others who may be affected by the work activities of HNY ICB to comply with the findings of all COSHH assessments. This includes the wearing and maintenance of Personal Protective Equipment (PPE) provided when necessary.

 Staff should make themselves aware of the potential risks and control measures in place for all activities that may involve hazardous substances within their work routines.

It is also the duty of all staff to report any deficiencies within the COSHH system, and to cooperate (where appropriate) in developing a safe outcome to identified deficiencies.

# COSHH Risk Assessment

Most substances used in an ICB building or function by HNY ICB staff (i.e., Hand washing soap in a bathroom or universal detergent cleaner used in a kitchen for washing up will be a low hazard but consideration must be made as some substances may not generally be harmful - but may be for some individuals with an allergy or sensitivity Where it is not practicable to use non-hazardous substances, information on all hazardous substances in use will be available.

All Buildings and certain functions will have a COSHH file that includes: -

* A Control Sheet: Hazardous Substances Inventory (Appendix 1)
* An up-to-date Safety Data Sheet (SDS) supplied by the manufacturer or supplier for each substance listed on the Inventory.
* A COSHH Risk Assessment (Appendix 2) for all substances (other than very low risk substances) should be listed on the Inventory.
* A summary of appropriate Control Measures (page 2 of the COSHH Risk Assessment – Appendix 2) for all substances (other than very low risk substances) listed on the Inventory.

COSHH Risk Assessments must be reviewed at least annually. A COSHH Risk Assessment must also be reviewed at any time if the substance, activity, or work practices changes or following any incident involving that substance.

SDS Safety Data Sheet (MSDS) will provide much of the information needed about any substance hazardous to health in use and as such forms a key part of the COSHH Risk Assessment. However, a SDS outlines generic risks. The COSHH Assessment must show that consideration has been given to use of hazardous substance in workplace environments, and identified additional risks that could relate to employees with access to the substance and in relation to the way that the Department uses the substance (‘local conditions’).

A completed COSHH Risk Assessment will provide information about local conditions and describe the local Safe System of Work (SSOW) to manage the risks identified. A COSHH Risk Assessment must be completed for all substances other than very low risk substances.

‘Very low risk substances are: -

* Any substance that can be used safely without specific instructions or training and/or
* Any substance that would not cause significant harm if used incorrectly.

Managers, Responsible and Competent HNY ICB Staff must decide from the information provided on the MSDS whether a substance is a ‘very low risk substance’ and the decision is to consider local conditions. A substance in use in an adult and employee only work area could be considered ‘very low risk’ but that same substance in a public area with vulnerable adults and young people may not be. If a substance is to be treated as a ‘very low risk substance’ this must be documented on the COSHH Inventory (Appendix 2).

**8 Allergies and Sensitivities**

Some substances may not be harmful - but may be for some individuals with an allergy or sensitivity (for example latex).

The ICB must show that we have considered the safety of those individuals in the work areas and workplace. Where such substances are in use a COSHH Assessment must be completed to describe arrangements for safe working and prevention of exposure for those with allergies and sensitivities.

Employees should be screened and assessed through Occupational Health and a risk assessment completed describing how that allergy and sensitivity will be managed in the workplace.

# Incident reporting

All incidents and accidents with substances hazardous to health, including any near misses, should be reported using the HNY ICB Incident Management APP

# 10 Training

All new employees must complete a Local Induction Checklist to include information on COSHH substances in use and the controls in place for safety All staff should be made aware of the COSHH risks identified in association with their duties and will also be made aware of risk assessments and the control measures that are in place to control identified risks. Suitable training will be given for staff to comply with these control measures as required.

# Monitoring and Effectiveness

Compliance with, and effectiveness of this policy will be monitored by the Health & Safety Lead who will ensure that they are included in the self-assessment audit of the individual premises, against the risk assessments and the policy to ensure continuing compliance. Any such audit will be recorded and retained with the copy of the risk assessments. Reports will also be submitted to the HNY ICB Health and safety meeting for compliance standards.

# Arrangements for Review

No policy or procedure will remain operational for a period exceeding three years without a review taking place or as required legislative changes or following incidents.

# Dissemination

The Executive Director Corporate Affairs will ensure through the ICB’s line management arrangements, that the COSHH Policy and considerations are included in any future business planning.

Directors will ensure appropriate cascading of COSHH procedures throughout their area of responsibility to ensure that the needs of the organisation are identified, prioritised and that any appropriate resources are allocated.

# Associated Documentation

Health and Safety Policy

# References

The following legislation is addressed by the introduction of this procedure:

• The Health and Safety at Work Etc Act 1974

• The Management of Health and Safety at Work Regulations 1999

• The Control of Substances Hazardous to Health Regulations 2002

Each of these statutes contains provisions which stipulate that non-compliance is a criminal offence and set out the penalties for such offences. The penalties on conviction include fines, imprisonment, or both. Those with managerial responsibility within HNY ICB, as well as the corporate body, may be prosecuted.

# Appendices

**Appendix 1 -** Control Sheet: Hazardous Substances Inventory

**Appendix 2 –** HNY ICB COSHH Risk Assessment form

**Appendix 3** - Safety Data Sheet and Risk Assessment Guidance

# Impact Assessments

## Equality

NHS Humber and North Yorkshire ICB is committed to creating an environment where everyone is treated equitably and the potential for discrimination is identified and mitigated. It aims to design and implement services, policies and measures that meet the diverse needs of our service, population, and workforce, ensuring that none are placed at a disadvantage over others.

This impact assessment should be completed for all human resources (HR) and corporate policies, projects or functions that apply to colleagues at NHS Humber and North Yorkshire Integrated Care Board (ICB).

The EqIA for this policy can be found attached to the bottom of this policy and be found on the HNY ICB Internet.

Potential adverse impact on any protected group identified through the EqIA will be monitored as part of the routine work to monitor compliance with the policy.

## Bribery Act 2010

Due consideration has been given to the Bribery Act 2010 in the development (or review, as appropriate) of this policy document, further details can be found below.

The ICB follows good NHS business practice as outlined in the Business Conduct Policy and the Conflicts of Interest Policy and has robust controls in place to prevent fraud, bribery, and corruption. Under the Bribery Act 2010 there are four criminal offences:

• Bribing or offering to bribe another person (Section 1)

• Requesting, agreeing to receive, or accepting a bribe (Section 2).

• Bribing, or offering to bribe, a foreign public official (Section 6).

• Failing to prevent bribery (Section 7).

## General Data Protection Regulations (GDPR)

The UK General Data Protection Regulation (GDPR)/ Data Protection Act 2018 includes the requirement to complete a Data Protection Impact Assessment for any processing that is likely to result in a high risk to individuals. Consideration should be given to any impact the policy may have on individual privacy; please consult NHS Humber and North Yorkshire ICB Data Protection Impact Assessment Policy. If you are commissioning a project or undertaking work that requires the processing of personal data, you must complete a Data Protection Impact Assessment.

The ICB is committed to ensuring that all personal information is managed in accordance with current data protection legislation, professional codes of practice and records management and confidentiality guidance. More detailed information can be found in the Data Protection & Confidentiality Policy and related policies and procedures.

**Appendix 1 - Control Sheet: Hazardous Substances Inventory**

|  |
| --- |
| **HNY ICB** |
|  |
| **Location (Office Location)** | **Date**  |
| **Person carrying out inventory.**  |
| **Hazardous substance and trade name**  | **Location in which the substance is stored, used, or produced**  | **Supplier/** **Manufacturer**  | **Safety Data** **Sheet held**  |
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| ***Note:* Any additions/deletions must be entered on the form. New assessments should be carried out before the product is used.**  |

**Appendix 2**

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|  |  |  |
| --- | --- | --- |
|  | **COSHH Risk Assessment No:** |  |
|  | **Work Area/Location**: |
| Describe the activity or work process.*(Include how long and how often this is carried out and the quantity of substance used)* |  |
| Location of process being carried out? |  |
| Identify the persons at risk: | Staff | Contractors  | Public*(including visitors)* |
| Name the substance involved in the process and its manufacturer.*(A copy of a current safety data sheet for this substance should be attached to this assessment)* |  |
| Classification of Hazard |
|

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| E:\Goldsmiths\Internet\COSHH\GHS Gifs\skull.gif |  | Can harm or kill if swallowed, inhaled or in contact with skin. |  |  | Highly or extremely flammable gas, aerosol, liquid, and vapour. |
|  |  | May corrode metals, cause severe skin burns and eye damage. |  |  | May cause allergic skin reaction or serious eye irritation; harm if swallowed or inhaled; harm to the environment. |
| A sign with a fish and a tree  Description automatically generated |  | Toxic to the aquatic life. | A sign with flames in it  Description automatically generated |  | May cause fire (or intensify it) or explosion. |
| A sign with a person in the middle  Description automatically generated |  | May damage fertility or the unborn child, cause cancer, allergies or asthma symptoms, damage organs. | A sign with a black and white design  Description automatically generated |  | Unstable explosive. Mass explosion hazard. |
| A sign with a black object in the middle  Description automatically generated |  | May explode if heated, cause burns or injury. |  |  |  |

 |
| Hazard Type |
|   Gas Vapour Mist Fume Dust Liquid Solid Other (State) |
| Route of Exposure |
|  Inhalation Skin Eyes Ingestion Other (State)  |
| Workplace Exposure Limits (WELs) *please indicate n/a where not applicable* |
| Long-term exposure level (8hrTWA): | Short-term exposure level (15 mins): |
| State the Risks to Health from Identified Hazards |
|  |
| Control Measures: *(for example extraction, ventilation, training, supervision). Include special measures for vulnerable groups, such as disabled people and pregnant workers.* *Take account of those substances that are produced from activities undertaken by another employer’s employees.*  |
|  |
| Is health surveillance or monitoring required?   YesNo |
| Personal Protective Equipment*(state type and standard)* |
| Dust mask |  | Visor |  |
| Respirator |  | Goggles |  |
| Gloves |  | Overalls |  |
| Footwear |  | Other |  |
| First Aid Measures |
|  |
| Storage |
|  |
| Disposal of Substances & Contaminated Containers |
|  Hazardous Waste Skip Return to Depot Return to Supplier Other(If Other Please State): |
|  |
| Is exposure adequately controlled?  | YesNo |
| **Risk Rating Following Control Measures** |
|  **High Medium Low** |

Appendix 3 - Safety Data Sheet and Risk Assessment Guidance

