

## Control of Substances Hazardous to Health (COSHH) Policy

***Please be aware that this printed version of the Policy may NOT be the latest version. Staff are reminded that they should always refer to the Intranet for the latest version.***

<b>Purpose of Agreement</b>	This document details Solent NHS Trust policy and procedure that has been produced to comply with the Control Of Substances Hazardous Health Regulations (COSHH) as amended and to protect both employees and others who use chemicals or other hazardous substances at work that can put people’s health at risk by ensuring exposure to substances hazardous to health are avoided wherever practicable, or where this is not practicable, to ensure exposure is minimised to the lowest reasonably practicable level, and to within statutory limits.
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1	September 2014		Minor Changes	01/09
2	January 2016		Equality & Human Rights Impact Assessment and inclusion of Appendix 4	01/16
3	January 2016		Recording the changes to safety signage that falls within the scope of classification, labeling and packaging of substances (CLP) and Under Globally Harmonised System (GHS)	01/16
4	January 2016		Evaluating and recording the changes within the manufacturer's safety data sheet	01/16
5	August 2019	various	Changes to Sypol COSHH assessment format, updated process requirement to complete COSHH assessments. High risk substances engagement with services to evaluate if they can be substituted for safer alternatives added.	06/19
6	April 2022	Various	Updated executive summary, reviewed, and updated COSHH legislative changes throughout.	01/04./22

## Review Log:

Include details of when the document was last reviewed:

Version Number	Review Date	Lead Name	Ratification Process	Notes
1	September 2015	DK		
2	September 2018	DK		
3	July 2019	DK	Policy Steering Group, Trust Management Team Meeting	Standard 3 year review
4	May 2022	DK	Policy Steering Group, Clinical Executive Group	Standard 3 year review, changes outlined above

## **Executive Summary**

This revised policy gives comprehensive guidance to prevent exposure to a single or mixture of hazardous substances and applies to all persons at work as well as others who may be affected by such work. It describes how Solent NHS trust can comply with its legal obligations under the Control of Substances Hazardous to Health Regulations 2002 (as amended)

By the means of this policy and arrangements, Solent NHS Trust demonstrates how to safeguard the health and safety of staff, patients, visitors, and others who may be affected by substances used by the Trust with the identification and controlling substances, ensuring suitable and sufficient COSHH assessments are carried out and identifying the information and training needs of all trust employees

This policy describes arrangements around providing safe management systems of hazardous substances and information necessary to enable employees to carry out their duties in a safe manner.

The policy gives comprehensive guidance regarding operations throughout Solent NHS Trust and provides standards of practice through risk assessments, awareness, training, suitable facilities, adequate resources to assess the risks associated with handling hazardous substances and take appropriate action to reduce such risks

Where the specific work tasks or activities introduce a potential risk, the policy outlines the process that should be followed to clearly establish the action that may need to be taken to ensure our staff remain safe by eliminating or reducing the risk to the lowest level so far as is reasonably practicable.

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## Control of Substances Hazardous to Health (COSHH) Policy

### 1. INTRODUCTION & PURPOSE

- 1.1 Many substances used in the workplace may produce either acute or chronic symptoms of ill health. The Control of Substances Hazardous to Health Regulations 2002 (**COSHH**) (as amended) place statutory duties on employers to prevent exposure of staff and others, to substances hazardous to health. Where this is not possible, exposure must be minimised to levels that are as reasonably practicable, and in any event to below statutory maximum Workplace Exposure Limits (WEL).
- 1.2 A substance shall be regarded as hazardous to health if it is hazardous in the form in which it occurs in the work activity, whether or not its mode of causing injury to health is known, and whether or not the active constituent has been identified. A substance hazardous to health may not necessarily be a single chemical compound but may include mixtures of compounds, micro-organisms, allergens. Substances hazardous to health can occur in many forms, e.g., solids, liquids, vapors, gases, dusts, fibers, fumes, mist, and smoke. They can also be biological agents such as pathogens or cell cultures
- 1.3 Control of Substances Hazardous to Health Regulations 2002 (as amended) applies to all persons at work as well as others who may be affected by such work. The regulations require the employer to identify ALL hazardous / potentially hazardous substances which may be used in the workplace or that may be produced by a process e.g., end product, by-product etc. or that may be emitted during any process e.g., dust, fumes etc. The employer must then conduct an assessment of these substances, evaluating the risk of exposure of people and, where necessary, take the appropriate precautions to prevent or control that exposure.
- 1.4 Workplace Exposure Limits (WEL's). The health and safety executive has established workplace exposure limits for several substances hazardous to health which are intended to prevent excessive exposure to specific hazardous substances. A WEL is the maximum concentration of an airborne substance, averaged over a reference period, to which an employee may be exposed by inhalation
- 1.5 The exceptions to undertake COSHH assessments are medicines, asbestos, lead and radioactive substances, which have their own regulations/ policies.
- 1.6 From 2015 under Globally Harmonised System (GHS) the classification and labelling of chemicals including safety data sheets, the old European Union EU orange symbols and classifications will no longer be used, except for biohazards and radioactive hazards, the labelling for these remains essentially unchanged.  
  
The new hazard pictograms under the classification, labeling and packaging (**CLP**) *can be found in Appendix 5*
- 1.7 Chemical Labelling and Packaging of substances (**CLP**) regulations as amended requires suppliers to provide recipients of hazardous substances or preparations (and in some cases, preparations which are not classified) with a document, known as a safety data sheet (SDS). The Safety Data Sheet (**SDS**) gives the recipient the information necessary to take measures relating to health and safety at work and the protection of the environment and contains information about the product organised under 16 standard headings.

- 1.8 All employers must consider how COSHH applies to the work they do, and this policy sets out the Solent NHS Trust arrangements for managing risks associated with using such substances to ensure:
- that the health and safety of people who come into contact with them is maintained.
  - that Solent NHS Trust complies with the Control of Substances Hazardous to Health Regulations 2002 latest amendments.
- 1.9 This policy and its associated guidance are intended to assist employees in complying with the statutory requirements of the Control of Substances Hazardous to Health Regulation 2002 (as amended) with the aim to prevent injuries occurring each year and reduce acute/ chronic ill health at work.

## **2. SCOPE & DEFINITIONS**

- 2.1 This policy applies to locum, permanent, and fixed term contract employees (including apprentices) who hold a contract of employment or engagement with the Trust, and secondees (including students), volunteers (including Associate Hospital Managers), bank staff, Non-Executive Directors and those undertaking research working within Solent NHS Trust, in line with Solent NHS Trust's Equality, Diversity and Human Rights Policy. It also applies to external contractors, agency workers, and other workers who are assigned to Solent NHS Trust.
- 2.2 External contractors are under the same legal obligations as Solent NHS Trust to comply with the COSHH Regulations. Contract Managers are responsible for ensuring contractors have carried out relevant COSHH assessments by including this as a requirement in the service specification.

## **3. PROCESS/REQUIREMENTS COSHH ASSESSMENT PROCESS**

- 3.1 Work activities that necessitate the use of chemicals or other dangerous substances at work that can put people's health at risk must involve the following:
- Assessing the risks to health of a substance during an operation/ procedure and removing or replacing the substance with one less harmful wherever reasonably practicable
  - Where potentially harmful substances need to be used safely as identified in the COSHH assessment:
    - a) Inform, instruct, and train employees about the risks of using hazardous substances and the precautions/ controls required
    - b) Implement the controls
    - c) ensure the controls measures are used and maintained
    - d) monitor exposure of workers to hazardous substances
    - e) carry out health surveillance where necessary
    - f) Prepare plans and procedures to deal with accidents, incidents and emergencies involving hazardous substances where necessary
- 3.2 COSHH assessments are undertaken by completing the online Sypol COSHH assessment form for all activities carried out by Solent NHS Trust employees working with chemicals or other

hazardous substances at work that can put people's health at risk. The COSHH assessments are then documented and reviewed, in accordance with the COSHH assessments findings

*Copy of Sypol COSHH assessment can be found in (Appendix 1)*

- 3.3 Manufacturers of products and substances that fall within the remit of the COSHH Regulations must produce, and make available, Safety Data Sheets for all such products. Having a Safety Data Sheet available is not a replacement or substitute for undertaking a COSHH risk assessment. COSHH risk assessments must be undertaken utilising information from the Safety Data Sheet
- 3.4 Once the COSHH assessment has been completed it is reviewed in accordance with the review period identified within the COSHH assessment or sooner when:
  - The working environment changes
  - The process in which the substance is used changes
  - Change in Legislation
- 3.5 COSHH assessments must be retained if a substance is in use
- 3.6 Obsolete COSHH assessments (for substances no longer in use) must be retained locally for five years from the date the substances were removed from use.
- 3.7 Monitoring and health surveillance records must be retained in accordance with Occupational Health guidance. It is not envisaged that any work activities undertaken within the Trust will expose employees to the specific hazardous substances listed in Schedule 6 of the COSHH Regulations that necessitate environmental monitoring and health surveillance, however, any queries on whether health surveillance is appropriate should be referred to the Trust's Occupation Health and Wellbeing team, or the Health and Safety Manager.
- 3.8 Where it is appropriate to undertake monitoring and health surveillance, the technique of investigation must present a low risk to the employee and records of health surveillance must be retained for a minimum of 40 (forty) years.

#### **4. ROLES & RESPONSIBILITIES**

- 4.1 **The Chief Executive Officer** for Solent NHS Trust is responsible for ensuring the organisation complies with all relevant Health & Safety legislation of which COSHH is a part and will be responsible for ensuring that individual staff are identified and given responsibility for the development, implementation, and subsequent monitoring of COSHH activities. The Chief Executive Officer will ensure that sufficient resources are provided to enable the policy to be implemented and to remain effective.
- 4.2 **Managers (Facility Managers, Support Services Managers, Premises Managers, and responsible persons both clinical and non-clinical)** are responsible for ensuring that day-to-day work activities under their control are carried out with regard to good Health and Safety management. In particular they are responsible for:
  - Implementation and monitoring of this Policy in areas of their remit.
  - Either appoint a COSHH assessor (s) within their service and ensure COSHH assessors attend COSHH specific training provided by the Health and Safety Manager records of any

such training will be held centrally by Learning and Development or seek COSHH assessments to be undertaken by the Health and Safety Manager

- Ensuring control measures and safe work procedures are in place and implemented to eliminate exposure, or if this is not possible, to at least minimise exposure to levels within statutory limits.
- Maintaining an inventory of all substances hazardous to health in each workplace, and also maintain up to date hazard information ( Safety Data Sheets) on each product/substance.
- Reviewing any system of work, supervision system or any other similar measure intended to manage or control exposure to hazardous substances at suitable intervals and revise if necessary.
- Where the use of Personnel Protective Equipment (PPE) is necessary, ensuring that appropriate PPE and / or Respiratory Protective Equipment (RPE) is provided and users are trained in its use, disposal and / or storage where it is identified as being required by a COSHH assessment
- Informing all employees and others who may work or be present in the affected areas of the purpose and safe operation of all engineering controls.
- Ensuring all changes to the control measures and changes of PPE are properly assessed and no new substances are introduced into the workplace without prior assessment.
- Ensuring all employees are provided with understandable information and appropriate training on the nature of the hazardous substances they work with.
- Those plans are in place to deal with accidents, incidents and emergencies concerning exposure to a hazardous substance, for example an accidental spillage of a chemical (as identified in the COSHH assessment)

#### 4.3 COSHH Assessors

4.3.1 **COSHH Assessors** can be any member of staff who has been suitably trained in carrying out COSHH assessments, are conversant with the operation and procedures of the department and have received a refresher course at least every three years or when there are changes in legislation.

4.3.2 COSHH Assessors are responsible for:

- Carrying out COSHH assessments in accordance with this policy
- Attending training/refresher training courses as required to maintain competence and skills
- Identifying appropriate control measures contained within the COSHH assessments and communicating to the persons affected, including emergency procedures (particularly where carcinogens, mutagens or biological agents are used).
- Identifying where exposure monitoring/ health surveillance is required and involving the health and safety Manager and Occupational Health Department
- Ensuring staff have local access to documented COSHH assessments, Material Safety Data Sheets
- Notifying their Service Manager and Health and Safety Manager where the COSHH Assessment identifies issues that cannot be managed locally.



4.4 **Employees** are required to:

- Undertake instruction and training in the safe use of hazardous substances they utilise or are exposed to at work.
- Work within the controls identified in the safe systems of work and received during training and instruction.
- Wear/use, store and dispose safely personal protective equipment or respiratory equipment identified as required in the COSHH assessment.
- Report any failure/inability to work within those controls to their COSHH Assessor, Line Manager and Service Manager.
- Immediately implement defined plans and procedures to control any accident, incident or emergency involving a hazardous substance and report such an incident via the reporting system
- Present themselves for health surveillance as required.

4.5 **Health and Safety Manager** will provide training for COSHH assessors to complete the web-based database Alcumus Sypol online COSHH assessments. All identified assessors must attend a COSHH assessor training session to receive appropriate training inclusive of elements of theory in conducting/reviewing COSHH risk assessments and practice on the use and application of control measures.

## 5. TRAINING

5.1 COSHH assessors training are obtained via the completion of the web-based database Alcumus Sypol online COSHH assessment course which includes elements of theory in conducting/reviewing COSHH risk assessments and practice on the use and application of control measures. This course is obtained via the Health and Safety Manager. COSHH Risk Assessors should refresh their training at least every 3 years.

5.2 All employees tasked with working with hazardous substances should be appropriately trained and competent to carry out the task in a safe and proper manner. In particular, the instruction must be sufficient and suitable for them to know

- how and when to use the control measures as per assessed within the COSHH assessment
- the defined methods of work
- how to use the personal protective equipment and especially respiratory protective equipment
- the cleaning, storage, and disposal procedures they should follow, why they are required and when they are to be carried out,
- the procedures to be followed in an emergency

5.3 Training in the use and application of control measures and PPE should take account of recommendations and instructions identified within the COSHH assessment and any data supplied by the manufacturer.

5.4 Records of training given to individual employees or specific groups of named employees to be kept locally for 5 years.

*Example COSHH Training Record Refer to Appendix 3*

## **6. COSHH REGISTER**

6.1 Each Service/department will maintain a COSHH Register which will contain:

- List of all relevant substances used in that service or department. Material Safety Data Sheets for each of those substances
- COSHH assessment for the use of those substances in normal use, abnormal, and emergency situations
- Other relevant COSHH documents (leaflets, information, correspondence, etc)

6.2 The COSHH Register should be available where any hazardous substances are used and kept in a place that is accessible to all staff.

*Copy of Sypol COSHH assessment Register Index can be found in (Appendix 2)*

## **7. RETENTION OF RECORDS**

7.1 COSHH assessments must be retained if a substance is in use and Obsolete COSHH assessments (for substances/activities no longer undertaken) must be retained locally for five years from the date the substance was removed from use/activity stopped.

7.2 Staff training records relating to COSHH must be retained locally for five years from the date the training took place (refer to Appendix 3 for an example of training records).

7.3 Health surveillance records must be retained in accordance with the Solent NHS Trust Occupational Health Department guidelines

*Copy of COSHH training record can be found in (Appendix 3)*

## **8. SUCCESS CRITERIA / MONITORING EFFECTIVENESS**

8.1 Health and safety Manager will monitor compliance with this policy as part of his day-to-day activities i.e., accident/ incident reports, staff complaints, management requests and review the Sypol system overview to establish high risk substances and engage with services to evaluate if they can be substituted for safer alternatives.

## **9. EQUALITY IMPACT ASSESSMENT AND MENTAL CAPACITY**

9.1 A thorough and systematic assessment of this policy has been undertaken in accordance with the Trust's Policy on Equality and Human Rights.

9.2. The assessment found that the implementation of and compliance with this policy has no impact on any Trust employee on the grounds of age, disability, gender, race, faith, or sexual orientation. (Refer to Appendix C: Equality impact assessment)

## **10. REVIEW**

10.1 This document may be reviewed at any time at the request of either staff side or management but will automatically be reviewed on a tri-annual basis unless organisational changes, legislation, guidance, or non-compliance prompt an earlier review.

## 11. REFERENCES AND LINKS TO OTHER DOCUMENTS

11.1 For advice on the COSHH regulations, contact the Health and Safety Manager. Documents include.

- COSHH Regulations 2002- Approved Codes of Practice L5 (Sixth Edition)
- COSHH Essentials 2003 HSG 193 - Easy steps to control chemicals
- EH40/2007 Workplace Exposure Limits (latest amendment)
- Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP) 4
- Classification, Labeling and Packaging of Substances and Mixtures Regulations 2009 (CLP)
- Seven steps to successful substitution of hazardous substances HSG 110
- Biological monitoring in the workplace HSG 167
- Personnel Protective Equipment at Work Regulations 1992
- Respiratory Protective Equipment at Work HSG 53
- Read the label: How to find out if chemicals are dangerous Leaflet INDG352
- Preventing contact dermatitis at work Leaflet INDG233
- Working with substances hazardous to health INDG 136
- The United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS)
- Health and Safety Policy
- Incident Reporting, Investigation and Learning Policy
- All Occupational Health policies relating to Health and Safety

## 12. GLOSSARY and DEFINITIONS

Control Of Substances Hazardous to Health (**COSHH**)  
Classification, Labeling and Packaging of substances (**CLP**)  
Globally Harmonised System (**GHS**)  
European Union (**EU**)  
Safety Data Sheet (**SDS**).  
Personnel Protective Equipment (**PPE**)  
Respiratory Protective Equipment (**RPE**)

## Appendix 1

EXPOSURE SCENARIO REPORT		www.alcumusgroup.com	
ID#:	3732435	User making request:	N/A
Fax:		Phone:	
Email:		Date Created:	01/03/2019
Date Assessment Reviewed	01/03/2019	Next Review Date:	01/03/2022
Material Code:	106427	Tradename:	ACTICHLOR 1.7G NADCC.
Supplier Code:	25346	Supplier:	ECOLAB LTD. UK
Supplier Phone:	01606 74488	IMC:	
Keyword:	Disinfectant	Frequency of use:	Monthly
Approximately how much of the material is used by one person in one working day:	1 tablet (1.7grms )	How many people are directly exposed?:	1
Are any other people put at risk from indirect exposure?:	No	How are they exposed?:	Wearing of disposable gloves and apron, eye protection if risk of splashes, Actichlor tablet is dissolved in cold water to make a solution in accordance with the dilution rates ( Required amount available chlorine is 1,000 Part Per Million). use solution to in accordance to Trust working environmental practice's for standard disinfection to kill MRSA, VRE, C diff, Norovirus.
Are there any susceptible workers?:	No	Susceptible Categories:	
Other info:		Is this material being used outside of the normal temperature range?:	No
Additional work practices:	Disinfects and cleans in one easy step guidance poster provided by ECO LAB (Health Division)		
Existing Control measures:	Well ventilated areas. duration and usage is varied dependent on localised disinfection required		
Exp Limit	Disinfects and cleans in one easy step guidance poster provided by ECO LAB (Health Division)		
Notes	Well ventilated areas. duration and usage is varied dependent on localised disinfection required		
Files Uploaded	Sodium carbonate 10mg/m3 Inhal8hTWA 4mg/m3 Resp8hTWA WEL		
File Name			
Activities			
Act No.	Method	Area	Exposure
15	Dissolving	Inside Well Ventilated	Up to 1/2 hour per shift
Work Area			
Work Area Code	Sub Area Code		
INFECTION PREVENTION			
Safer Substitute Chosen	No	Reason for leaving/swapping material	

MATERIAL/PROCESS

ACTICHLOR 1.7G NADCC.

MEDIUM HAZARD

SOLID

SUPPLIER ECOLAB LTD. UK  
KEYWORD Disinfectant

CONTENTS

Troclozene sodium 50 - 100%, Adipic acid 20 - < 25%,  
Sodium carbonate 3 - < 5%,

SIGNAL WORD WARNING

EXP LIMIT Sodium carbonate 10mg/m3 Inhal8hTWA  
4mg/m3 Resp8hTWA WEL



MEDIUM ACUTE RISK - FULL EXPOSURE

MEDIUM CHRONIC RISK - FULL EXPOSURE

MEDIUM ACUTE RISK - INDIVIDUAL ACTIVITY

METHOD Dissolving

AREA Inside Well Ventilated

EXPOSURE TIME Up to 1/2 hour per shift

MEDIUM CHRONIC RISK - INDIVIDUAL ACTIVITY

CONTROL MEASURES



AVOID SKIN CONTACT

IF OVEREXPOSURE LIKELY

IF CONTACT LIKELY



WASH AFTER EXPOSURE

IF HEAVILY SOILED



OR STORE WITH ACIDS

ACID REACT/ACUTE HAZARD

HEALTH HAZARDS

Minimal risk of exposure when intact  
Harmful if swallowed  
Causes serious eye irritation  
May cause respiratory irritation  
Contact with acids liberates toxic gas  
Very toxic to aquatic life with long lasting effects  
Very toxic to aquatic life  
If dust produced see below  
Skin - irritation and dermatitis may result from prolonged contact

CONSIDERATIONS

SPILLAGE

Avoid excessive exposure to hands/skin - use suitable gloves if necessary  
Contain and collect material  
Dispose or recycle of spillages in a controlled manner - Refer to Hazardous Waste Regulations if appropriate

FIRST AID

Inhalation - remove to fresh air; get immediate medical attention after significant exposure or if feeling ill  
Ingestion - do not induce vomiting, wash out mouth with water  
Ingestion - give plenty of water in sips, obtain immediate medical attention  
Eye - rinse thoroughly with water for 20 minutes - take care not to affect uncontaminated eye. If irritation

## Appendix 2

### Assessment Index

for INFECTION PREVENTION ( )



Search terms: Current Assessments; filter=All; Risk Ratings=Acute;

Facility	Work Area	Sub Area	Assessment Id	Risk Rating	Hazard Level	Material Code	IMC	Tradename	Keyword	Supplier	CCS	SDS	Last Review	SDS Date
1	INFECTION PREVENTION		3732435	MEDIUM	MEDIUM	106427		ACTICHLOR 1.7G NADCC	Disinfectant	ECOLAB LTD. UK	Yes	Yes	01/03/2019	03/12/2015
1	INFECTION PREVENTION		3734150	LOW	LOW	182069		CLINELL DETERGENT WIPEB	Cleaner (Wipes)	GAMA HEALTHCARE LTD	Yes	Yes	05/03/2019	16/05/2016
1	INFECTION PREVENTION		3732437	LOW	MEDIUM	217367		CLINELL UNIVERSAL WIPEB	Disinfectant wipes	GAMA HEALTHCARE LTD	Yes	Yes	01/03/2019	16/04/2019
1	INFECTION PREVENTION		3735589	LOW	LOW	315691		GLITTERBUG POTION	Cosmetic	Brevia Corporation	Yes	Yes	09/03/2019	30/06/2015

Appendix 3

COSHH Training Record



Name of Service :	
Name of Hospital, Health Centre, etc	Name of Ward or Department, etc
Name of Risk Assessor & Responsible Service / Manager	

List of substances assessed	Date Assessment copied	Training Record – each member of staff to initial & date column for each substance they use.									
		<i>I have received suitable and sufficient information, instruction and training relating to the safe use of the substance/s listed below.</i>									

## Appendix 4

### Equality Analysis and Equality Impact Assessment

**Equality Analysis** is a way of considering the potential impact on different groups protected from discrimination by the Equality Act 2010. It is a legal requirement that places a duty on public sector organisations (The Public Sector Equality Duty) to integrate consideration of Equality, Diversity, and Inclusion into their day-to-day business. The Equality Duty has 3 aims, it requires public bodies to have due regard to the need to:

- **eliminate unlawful discrimination**, harassment, victimisation, and other conduct prohibited by the Equality Act of 2010.
- **advance equality of opportunity** between people who share a protected characteristic and people who do not.
- **foster good relations** between people who share a protected characteristic and people who do not.

**Equality Impact Assessment** (EIA) is a tool for examining the main functions and policies of an organisation to see whether they have the potential to affect people differently. Their purpose is to identify and address existing or potential inequalities, resulting from policy and practice development. Ideally, EIAs should cover all the strands of diversity and Inclusion. It will help us better understand its functions and the way decisions are made by:

- **considering the current situation**
- **deciding the aims and intended outcomes of a function or policy**
- **considering what evidence there is to support the decision and identifying any gaps**
- **ensuring it is an informed decision**

### Equality Impact Assessment (EIA)

#### Step 1: Scoping and Identifying the Aims

Service Line / Department	All NHS Trust staff Independent Contractors		
Title of Change:			
What are you completing this EIA for? (Please select):	Please select	<i>(If other please specify here)</i>	
What are the main aims / objectives of the changes	This document has been produced in accordance with the general requirements of the Control of Substances Hazardous to Health Regulations. The policy has been compiled to provide guidance to Directors, Managers, Supervisors and Employees on the arrangements for managing safe practices for controlling hazardous substances that are used at work		

#### Step 2: Assessing the Impact

Please use the drop-down feature to detail any positive or negative impacts of this document /policy on patients in the drop-down box below. If there is no impact, please select "not applicable":

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	Not applicable	Action to address negative impact: <i>(e.g., adjustment to the policy)</i>
Sex			X	
Gender reassignment			X	



Disability			X	
Age			X	
Sexual Orientation			X	
Pregnancy and maternity			X	
Marriage and civil partnership			X	
Religion or belief			X	
Race			X	

*If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.*


Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, service users, careers, or other voluntary sector groups?)	Yes	There has been regular consultation with occupational health and wellbeing team, head of risk and litigation, and the health and safety group members
Have you taken into consideration any regulations, professional standards?	Yes	Health and safety, fire, and environmental executive regulative requirements

#### Step 3: Review, Risk and Action Plans

How would you rate the overall level of impact / risk to the organisation if no action taken?	Low	Medium	High
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
What action needs to be taken to reduce or eliminate the negative impact?	N/A no negative impact identified		
Who will be responsible for monitoring and regular review of the document / policy?	The Review of this policy and EIA will be conducted by the H&S manager and chair of the health and safety group		

#### Step 4: Authorisation and sign off

*I am satisfied that all available evidence has been accurately assessed for any potential impact on patients and groups with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.*

Equality Assessor:		Date:	01/05/2022
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## Appendix 5

### **Globally harmonised system (GHS) for the classification and labelling of chemicals including safety data sheets.**

From 2015, the old EU orange symbols and classifications will no longer be used, except for biohazards and radioactive hazards, which are not covered by GHS due to the nature of the hazards involved. The labelling for these remains essentially unchanged.

Classification, Labelling and Packaging of Substances & Mixtures Regulations (CLP) hazard pictograms



Explosive (Symbol: exploding bomb)



Flammable (Symbol: flame)



Oxidising (Symbol: flame over circle)



Corrosive (Symbol: Corrosion)



Acute toxicity (Symbol: Skull and crossbones)



Hazardous to the environment (Symbol: Dead tree and fish)

You'll see that the old 'harmful/irritant' symbol is missing. This has been replaced by the exclamation mark pictogram:



Health hazard/Hazardous to the ozone layer (Symbol: Exclamation mark)

A couple of new pictograms have also been introduced:



Serious health hazard (Symbol: health hazard)



Gas under pressure (Symbol: Gas cylinder)