



H&S: 022 Control of Substances Hazardous to Health Policy

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Policy Manager: Head of Health and Safety	Other Key Stakeholders: Chief Executive, Director of Human Resources
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INTRODUCTION

The purpose of the Control of Substances Hazardous to Health Regulations 2002 as amended (COSHH) is to protect workers from harm arising from substances used at their normal place of work or work process.

The Scottish Ambulance Service recognises the responsibility placed upon it by the COSHH and will take all steps that are reasonable and practical in order to comply with the requirements of those regulations.

This policy and accompanying Service COSHH procedures are based on the requirements of the Health and Safety at Work Act 1974 and the COSHH. The legislation applies to all people at work and other persons affected by such work.

POLICY STATEMENT

The Scottish Ambulance Service recognises its statutory, civil, moral and financial responsibility to manage risk. The Service Board is committed to providing robust risk management strategies and procedures in order to safeguard the organisation, its employees, patients and others who might be affected by its activities.

This policy encompasses all risk, with clinical and non-clinical risks being of equal status and importance. All significant risk will be risk assessed, documented and entered onto the Service Risk Register.

The Service requires that all risks, adverse incidents, near misses or hazards be reported and documented (Datix) as part of a proactive approach to risk management. This procedure details the action to be taken, which applies equally to clinical and non clinical incidents.

Where incidents/risks are reported they will be investigated and all reasonable steps taken to implement control measures which will either remove or reduce the level of risk to an acceptable level. The Service will aim to respond quickly and positively to all risk issues in order to mitigate their consequences in the best interest of the organisation, patients and staff.

The Service will ensure that all policies and procedures relating to risk management (including safe working practices) are made widely available to all staff and will ensure that all employees are suitably informed and trained in the Scottish Ambulance Service procedure for the reporting and management of risk.

SUBSTANCES HAZARDOUS TO HEALTH

COSHH 2002 applies to a very wide range of substances and preparations, mixtures of two or more substances-with the potential to cause harm if they are inhaled, ingested or come into contact with or are absorbed through the skin. These include individual chemical substances or preparations such as paints, cleaning materials, metals, pesticides and insecticides. There can also be biological agents such as pathogens or cell cultures.

Substances hazardous to health can occur in many forms, e.g. solids, liquids, vapours, gases, dusts, fibres, fumes, mist and smoke.

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OBJECTIVE

The Scottish Ambulance Service, so far as is reasonable and practical, will:

- Identify and record all substances normally used, stored or transported by the Service.
- Assess the risk to staff, patients and public presented by those substances and take all reasonable and practical steps to eliminate or minimise these risk.
- Where the risk cannot be eliminated, ensure that procedures or protective equipment exists to prevent or control exposure.
- Ensure that control measures are monitored and where appropriate tested.
- Make available to all staff information relating to the control and safety of those substances normally used, stored or transported by the Service.
- Ensure that all members of staff receive appropriate instruction and training.
- Ensure that no contractor will use or store any substance on premises owned or operated by the Service, without first declaring the substance, producing a Material Safety Data Sheet, (MSDS) and obtaining permission from the appropriate Service Manager.
- Ensure that any substances, with the exception of food and beverages, retained by staff for their own use e.g. toiletries: will be secured within their personal locker when not in use.

RESPONSIBILITIES

Chief Executive

The Chief Executive has overall accountability for the management of Health and Safety and will delegate responsibility to ensure that adequate and appropriate resources are made available to ensure that the Service meets its statutory obligations noted in this Policy.

Head of Service/Department Managers

Are responsible for:

- Ensuring that the Service procedures, policies and process are complied with.
- Ensuring that employees working in the operational areas of the Service receive adequate information, instruction and training on hazardous substances in the emergency setting (i.e. chemical spill at a Road Traffic Collision).

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- Ensuring that substances used by employees are only those supplied by the Service.
- Ensuring that employees wear any PPE that is provided in relation to working with a hazardous substance.
- Ensuring that employees report any untoward incidents, such as accidents or ill health, involving exposure to a hazardous substance. This is to be done in accordance with the Service Untoward Incident Reporting Policy and Procedures

Head of Health and Safety

Is responsible for:

- Ensuring that any procedures for complying with COSHH Regulations 2002 and any regulations affected by COSHH are in place.
- Ensuring senior managers are aware of their legal obligations under COSHH.
- Ensuring the Health and Safety Management System is in place and allows the Service to comply with existing COSHH legislation.
- Advising the senior management team of any forthcoming legislation which may affect the operation of the Service.
- Proposing procedural changes to allow the Service to comply with new Health and Safety law prior to its implementation.
- Ensuring that all divisions and departments are appropriately audited.

Divisional Health and Safety officers

Are responsible for ongoing monitoring of this policy, ensuring that Risk Assessments are undertaken and updates issued to the Service COSHH register on the Rivo System. For:

- Ensuring that any procedures for complying with COSHH Regulations 2002 and any regulations affected by COSHH are in place.
- Ensuring all staff and managers are aware of their legal duties under COSHH.
- Advising the Head of Health and Safety of any identified shortfalls in the management system.
- Monitoring and collating the Audit and review of stations and departments.

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MANAGEMENT RESPONSIBILITY

- The Scottish Ambulance Service recognises its responsibility in ensuring that employees are not intentionally exposed to hazardous substances.
- The Service also aims to ensure that any hazardous substances used in its activities present the lowest practicable risk to the health, safety and welfare of its staff.
- To ensure all substance receptacles are correctly and clearly identified.
- Ensure that substances used by employees are only those supplied by the Service.
- Where fitted in vehicle workshops and ambulance stations Local Exhaust Ventilation (LEV) Systems provided to remove hazardous fumes are regularly inspected every 14 months and maintained.
- Where vehicle workshops and ambulance station garages don't have LEV's fitted, that sufficient ventilation is present.
- Where substance risk cannot be eliminated, substituted or controlled, suitable PPE will be provided, and training on its use where necessary.
- To provide information, instruction and training where required to employees and others who may be affected.
- Identify (by signage) areas of significant risk so that visitors (in particular other emergency services) and contractors are aware of any substances on the premises that offer significant risk to health.
- To provide preventative treatment for blood borne virus and infectious diseases to those staff identified as at risk.
- To liaise closely with any contractor required to undertake work on Service premises and the work requires use of a substance affected by COSHH 2002, so to ensure that any safety measures or safe systems of work are brought to the attention of staff.
- Liaise with the Risk and Health and Safety team and Occupational Health where any employee has suffered ill-health, or may require health surveillance, from exposure to hazardous substance. This is particularly important where the employee is a new or expectant mother.
- Any incident where serious injury/illness results from exposure to a hazardous / biological substance, a full investigation will be undertaken and

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a report sent to the Head of Health and Safety, the Regional Health and Safety Manager and the Divisional Health and Safety Officers.

Employees have a responsibility to:

- Ensure that they familiarise themselves with any Risk Assessments, Material Safety Data Sheets or other information relating to hazardous substance within their workplace.
- Ensure that they have received adequate information and/or training in the use of hazardous substances and in the case of emergency staff, contact with potentially hazardous substances in the emergency setting.
- Use any Personal Protective Equipment (PPE) that has been provided for use when working with a hazardous substance.
- Report on a Datix incident form (and to their line manager, immediately if urgent) any incident involving a substance hazardous to health. They must report any illness suspected of being related to exposure to a substance at work and should co operate with any health surveillance programme established to monitor their health.

PURCHASING PROCEDURES

The Service procurement policy and the guidance on specification guidance document should be referred to when procuring any goods and substances to ensure compliance with all relevant H&S Legislation. No other purchasing approaches should be adopted.

Manufacturers and suppliers of substances and materials have a legal duty to supply Material Safety Data Sheets for the materials provided. All purchases/ requisitions should include a request to supply Material Safety Data information sheets.

The Procurement Department will liaise with the Health and Safety team to ensure that all substances labelled, 'hazardous to health' are risk assessed prior to purchase.

The Procurement Department will continue to actively seek to provide suitable alternatives which pose less risk to health and/or the environment.

EDUCATION DEPARTMENT

The Education Department will ensure that all employees whose main role involves emergency working (i.e. Paramedics, Technicians , Operational Managers etc) are given adequate information and training in relation to the risk relating to hazardous substances in the emergency setting, for example chemical spills, This training will include dynamic risk assessment.

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MATERIAL SAFETY DATA SHEETS (MSDS)

In many circumstances reading the supplier's Material Safety Data Sheet will be enough to decide whether existing practices are sufficient to ensure adequate control of exposure. In other circumstances, in particular for new activities, it may be necessary to read HSE guidance notes, manufacturer's standards, technical papers, trade literature etc to estimate the likely exposure before deciding what control measures should be applied.

Managers must ensure that substances are not taken into use until such time as data sheets are obtained and COSHH assessments have been carried out. Suppliers have a legal obligation to supply these sheets under the Chemicals Hazard information and Packaging for Supply Regulations 1994;

DEFINITIONS

"Substance" means any natural or artificial substance whether in solid or liquid form, or in the form of gas, dust or vapour.

"Substances hazardous to health" are defined as:

- A substance which has as Maximum Exposure Limit, or for which the Health and Safety Executive has approved an Occupational Exposure Limit.
- A Biological Agent.
- Dust of any kind when present at a substantial concentration in the air.

"Biological Agent" means any micro-organism, cell culture or human endoparasite, including any which have been genetically modified which may cause infection, allergy toxicity, or otherwise create a hazard to human health.

"Carcinogen" means any substance, or preparation, which is classified as being carcinogenic.

RISK ASSESSMENT

Assessing the risk involves making a judgment on how likely it is that the hazardous substance will affect the health of the person using or coming into contact with it.

Competent persons are appointed by the Health and Safety Department to carry out Risk Assessments of the exposure to substances hazardous to health.

Competent persons include members of the Risk and Safety Team, Line Managers and Occupational Health professionals.

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All operations that involve, or may involve, exposure to a hazardous substance will be assessed. Where elimination or substitution of the hazardous substance is not possible then appropriate measures will be taken to reduce or control the risk.

Advice will be sought from Occupational Health as to any specific precautions or health surveillance that may be required.

Risk Assessments will be documented using the Rivo COSHH Risk Assessment template.

Completed Risk Assessments and Material Safety Data Sheets will be circulated in the COSHH File on the @SAS Intranet site, so accessible to all staff.

Risk Assessments must be reviewed every 2 years or sooner if:

- There has been a significant change in the workplace.
- There has been a significant change in the use of a substance.
- Where the risk is no longer valid.

MONITOR & REVIEW

This Policy / Procedure will be subject to review on a 2 yearly cycle by the Health and Safety Committee to ensure that protocols in place are sufficient, and that there have not been any changes in practice.

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KNOW YOUR SYMBOLS

COSHH – Know your warning symbols

Under COSHH all persons at work need to know the safety precautions to take so as not to endanger themselves or others through exposure to substances hazardous to health.

International symbols will replace the European symbols in 2009. Some of them are similar to the European symbols but there is no single word describing the hazard. The most noticeable feature is the change in the labelling symbols: instead of the hazard symbols with black printing on orange-yellow rectangles that have been used to date, now nine hazard pictograms with black symbols on a white background with red-rimmed rhombuses are used to provide warnings

The new international hazard symbols and warning and precautionary phrases will be used on labels which will replace the danger signs, risk and safety phrases. The table in Appendix A shows the main categories of the new CLP pictograms and the current Hazard Symbols which they are replacing.



Appendix 1 CHIP Symbols

Description	Old Pictogram	New Pictogram	Hazard class and hazard category:
Exploding Bomb			Unstable explosives Explosives of Divisions 1.1, 1.2, 1.3, 1.4 Self reactive substances and mixtures, Types A,B Organic peroxides, Types A,B
Flame			Flammable gases, category 1 Flammable aerosols, categories 1,2 Flammable liquids, categories 1,2,3 Flammable solids, categories 1,2 Self-reactive substances and mixtures, Types B,C,D,E,F Pyrophoric liquids, category 1 Pyrophoric solids, category 1 Self-heating substances and mixtures, categories 1,2 Substances and mixtures, which in contact with water, emit flammable gases, categories 1,2,3 Organic peroxides, Types B,C,D,E,F
Flame Over Circle			Oxidizing gases, category 1 Oxidizing liquids, categories 1,2,3
Gas Cylinder			Gases under pressure: - Compressed gases - Liquefied gases - Refrigerated liquefied gases - Dissolved gases
Corrosion			Corrosive to metals, category 1 Skin corrosion, categories 1A,1B,1C Serious eye damage, category 1
Skull and Crossbones			Acute toxicity (oral, dermal, inhalation), categories 1,2,3

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Description	Old Pictogram	New Pictogram	Hazard class and hazard category:
Exclamation Mark			Acute toxicity (oral, dermal, inhalation), category 4 Skin irritation, category 2 Eye irritation, category 2 Skin sensitisation, category 1 Specific Target Organ Toxicity – Single exposure, category 3
Health Hazard	 		Respiratory sensitization, category 1 Germ cell mutagenicity, categories 1A,1B,2 Carcinogenicity, categories 1A,1B,2 Reproductive toxicity, categories 1A,1B,2 Specific Target Organ Toxicity – Single exposure, categories 1,2 Specific Target Organ Toxicity – Repeated exposure, categories 1,2 Aspiration Hazard, category 1
Environment			Hazardous to the aquatic environment - Acute hazard, category 1 - Chronic hazard, categories 1,2

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OTHER SERVICE REFERENCE & RELATED DOCUMENTS

- HSE Control of Substances Hazardous to Health (Fifth Edition)
- Chemicals (Hazard Information and Packaging for Supply) Regulations 2009
- Approved Code of Practice and Guidance HSE EH40 — 2005 second edition 2011
- Risk Management Strategy
- Adverse Incident and Investigation 004
- Infection Control Policy 003
- Policy PPE Policy 035
- Spill Management Procedure – Appendix 1

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Appendix 1

Spill Management Procedure

Are you prepared for an emergency?

Accidental chemical spills can lead to serious injury (slips trips and falls) and or to illness from exposure to the chemical. In addition accidental chemical spills can wind up being disastrous for the environment and result in costly fines and cleanup activities, so it is important to know how to deal with spills no matter how big or small.

Dealing with minor spills

A small spill is considered to be a spill of 5 litres or less providing the product is not concentrated. For concentrated products of any quantity the spill must be treated as a large spill.

1. Assess safety. Make sure that people are kept clear, and that you have the right training and equipment to deal with the spill.

2. Stop the source. Providing it is safe to do so, stop the spill at its source. This may involve righting an overturned container or sealing holes or cracks in containers.

3. Contain and clean up the spill. The spill should be cleaned up immediately.

4. Record the incident on DATIX: Record what, how and where the spill occurred and the names of any witnesses. Also make note of what changes can be made when handling, transporting or storing chemicals to ensure a similar incident does not happen again.

Dealing with large spills

A large spill is considered to be anything over 5 litres or concentrated chemicals of any volume.

1. Assess safety. Make sure that people are kept clear, and that you have the right training and equipment to deal with the spill.

2.. Consult the Material Safety Data Sheet (MSDS). The MSDS will have instructions on how to deal with specific chemical spills. Available on SAS site – link below.

<http://sas/healthandsafety/COSHH/Pages/default.aspx>

3. Put on protective clothing. If necessary, put on gloves, goggles, a mask and an apron.



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4. Stop the source. Providing it is safe to do so, stop the spill at its source. This may involve righting an overturned container or sealing holes or cracks in containers.

5. Contain and control the flow. The spill should be prevented from filtrating into the ground or entering the storm water system. The outer edge of the spill should be dammed with rags, blankets, sand, sands bags, mops and/or absorbent booms.

6. Clean up the spill. Promptly cover the spill using absorbent materials such as the correct absorbent granules for the product (Note that some strong acids will react with some types of granules and sawdust), sand and rags, being mindful not to splash the spill. Using a dustpan or spade, the absorbent granules or sand must then be scooped up and placed into a container. This waste material is not to be buried or thrown into the environment. The method of disposing this waste will depend on the amount and the type of chemical that was spilt. The Scottish Environmental Protection agency (SEPA) and Local authority will advise on the appropriate disposal of hazardous substances. (Also check MSDS for the appropriate disposal method advice).

7. Notify the appropriate authority. If the spill does enter a storm water drain or open ground, SEPA , as well as your local council must be notified. Please refer to the phone numbers listed overleaf. If there is a hazard to health or property, call Fire and Rescue Service on 999 immediately.

8. Record the incident on DATIX: Record what, how and where the spill occurred and the names of any witnesses. Also make note of what changes can be made when handling, transporting or storing chemicals to ensure a similar incident does not happen again.

Who to call for advice

Divisions	H&S Officer	Contact Number
South East /East Central/ SORT	George Spiers	07833483893
West Central /South West/ FLEET	Geoff Evans	07833483903
North/ScotSTAR/Airwing	Darren Chambers	07833483890
	Fay McNicol	07881356419
	Tony Wigram	07769951824
	Lorraine McAffer	07920271600

Examples of Material which may require spill kits:

The list below is for illustrative purposes and is not exhaustive.

The following materials may mean that the location may require spill control:

- Ad Blue
- Traffic Film Remover

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- Diesel
- Oils

Spill Response Procedure



1. Identify the spill and clear the area



2. Locate your spill kit and use appropriate PPE



3. Place a barrier around the spill



4. Cover completely with absorbent material



5. Sweep up any floor dry material



6. Bag and Tag for EHSO chem. waste removal

Review History

Issue No	Reason for review and brief description of changes made	Effective Date
1	Initial Issue	Jun 12
2	Update to Chemical Hazard Information Packaging (CHIP) 4 regulations	Jun 15
2.1	Spill Procedure added	Jan 17

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