

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH POLICY

Version 1.0

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Name and Title of Author:	Helen Johnson, Health & Safety Advisor
Name of Responsible Committee/Individual:	Hull CCG Health & Safety Group
Equality and Diversity Impact Assessment:	Attached
Trade Union Representative Approval:	Yes
Implementation Date:	17 th March 2015
Review Date:	16 th March 2017, or before if required.
Target Audience:	All Staff

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1. Introduction

The Control of Substances Hazardous to Health Regulations 2002 (as amended) covers all substances, materials, chemicals, etc used in the work place that may be considered hazardous to a persons 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 his employees, and anyone else who may be affected by his work activities, 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.

2. Policy Statement

Hull Clinical Commissioning Group (Hull CCG) 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 Hull CCG.

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.

3. Statutory Requirements

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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

4. Scope of the Policy

This policy applies to all employees and office holders of Hull CCG and any other persons occupying or working at CCG premises, such as employees of other organisations, private contractors, agency staff and volunteers. Agency staff contracts will reflect the need for staff to adhere to this policy.

5. Equality

All policies require an assessment for their impact on people with protected characteristics. An Equality Impact Assessment has been undertaken for this policy and as a result of performing the analysis, it is evident that there is no risk of discrimination in the implementation of this policy. The assessment can be found in Appendix 1.

In applying this policy, the CCG will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic. Standard CCG paragraph to be added

6. Organisation

Hull CCG Director or Quality and Clinical Governance/Executive Nurse has overall responsibility for Health & Safety, and therefore the design, implementation and monitoring of the COSHH system within the organisation. Trained Assessors are appointed to oversee and assess the operation of the system on a continuous basis.

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For communication purposes, procedures for the application of the COSHH system are detailed within this document. This Procedure will be published both on the Hull CCG intranet and in hard copy.

Everyone operating within the Hull CCG COSHH system does so on the understanding that it represents a system of evaluation and control demanded by the Control of Substances Hazardous to Health Regulations 2002 (as amended). Any failings of the COSHH system should be reported in the first instance to Line Management, and then to the Health and Safety Advisor.

7. Responsibilities

7.1 Director with responsibility for Health and Safety

The Director with responsibility for health and safety has the overall responsibility to ensure that Hull CCG complies with all relevant health and safety legislation. Specific duties include:

- Provide reports/feedback, where appropriate, to the Board on all matters relating to the Control of Substances Hazardous to Health.
- Ensure that the Health and Safety Advisor manages the COSHH system on a day to day basis.
- Receive reports on audits of the COSHH system by the Health and Safety Advisor and ensure that, if appropriate, recommendations are acted upon and corrective actions are taken.

7.2 Health and Safety Advisor

The Health and Safety Advisor has responsibility for the ongoing management of the COSHH system. Specific duties include:

- Maintenance of the completed risk assessment records.
- Review completed assessments to ensure that they have been completed in accordance with this procedure and provide guidance as necessary to the authorised COSHH Assessors.
- Audit the COSHH system on a regular basis and provide a report to the Director with responsibility for Health and Safety on such audits.

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- 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 Hull CCG Health and Safety Policy.

7.3 COSHH Assessors

Staff with relevant experience should be nominated by their Line Manager to attend a recognised COSHH Assessor Training Course. Once qualified, 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 forwarded to the Health and Safety Advisor 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.
- In the absence of a trained COSHH Assessor, this role will be undertaken by the Health & Safety Advisor.

7.4 All Staff

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

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.

8. Performance Standards

Any activity carried out within Hull CCG business which may result in exposure to a substance hazardous to health must only be carried out after a suitable and sufficient assessment of the risks involved. The assessment must properly consider and apply the Principles of Good Practice where the elimination or substitution of the risk must be considered as the primary methods of control. Where this is not possible other adequate control measures must be applied. The authorised assessor working with those who are familiar with the activity will complete the assessment.

All assessments must be completed on the Hull CCG COSHH Assessment form. The assessor must ensure that this form correctly describes the tasks and the potential for exposure. The form should be signed and dated, and include a date for review.

The original and signed paper copies of COSHH assessments should be held locally within the organisation where they are applicable, and communicated to those affected. Assessments should also be stored electronically under the control of the Health and Safety Advisor.

The Line Manager (Responsible Manager) and the Health and Safety Advisor must ensure that all COSHH assessments are reviewed at the agreed date or if any significant change has taken place which may affect the risks associated to exposure to substances hazardous to health. As a minimum all assessments should be reviewed annually.

Where control measures are required, Line Management must ensure their use. The Line Manager must also ensure that all control measures, including PPE, are properly maintained and procedures observed and revised as appropriate.

The Line Manager and Health and Safety Advisor must ensure that any additional information, instruction and training of employees is provided to ensure that the risks are adequately controlled. Records of all such provision must be kept locally along with records of maintenance of other control measures.

9. Measuring Performance

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All those operating within the COSHH system should assess it continuously on an informal basis. Any faults, failings and potential areas for improvement should be communicated to the Health and Safety Advisor.

More formally, the system will be reviewed regularly by the Health and Safety Advisor to ensure continued compliance with regulatory requirements. Reviews of the system will take account of various sources of information, from individual feedback to analysis of incident statistics.

The Health and Safety Advisor will keep up to date with any changes in statutory requirements and implement them where appropriate.

10. Review

This policy will be reviewed every 2 years or as required by legislative changes.

11. Referenced Documents:

- The Health and Safety at Work etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Health and Safety (First Aid) Regulations 1981
- Selecting a First Aid Training Provider – HSE Guide for Employers
- Hull CCG Health and Safety Policy

Equality Impact Assessment:

Equality Impact Analysis:	
Policy / Project / Function:	Control of Substances Hazardous to Health (COSHH) Policy
Date of Analysis:	17-Mar-15
This Equality Impact Analysis was completed by: (Name and Department)	Helen Johnson, Health & Safety Advisor
What are the aims and intended effects of this policy, project or function ?	This policy aims to identify the risks associated with COSHH products in the workplace, and eliminate them wherever possible. Where this is not possible, a risk assessment process will identify suitable control measures in order to reduce the risk to a level which is as low as is reasonably possible (ALARP)
Please list any other policies that are related to or referred to as part of this analysis	<ul style="list-style-type: none"> • Risk Management Strategy • Health & Safety Policy
Who does the policy, project or function affect ? Please Tick ✓	<p>Employees ✓</p> <p>Service Users</p> <p>Members of the Public</p> <p>Other (List Below)</p>

Equality Impact Analysis:

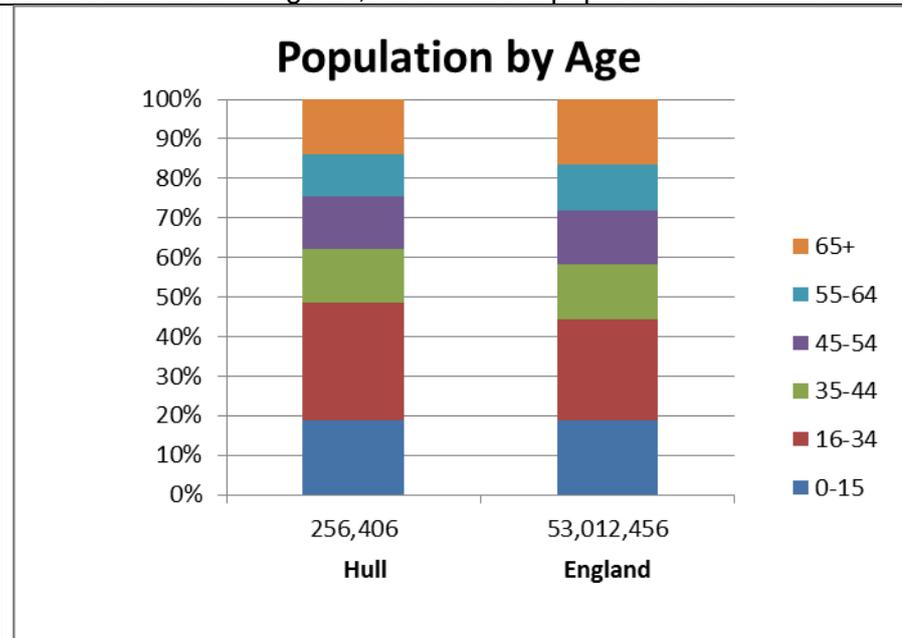
Local Profile/Demography of the Groups affected (population figures) Relevant data can be found in the attached Knowledge Management Toolkit

General

There are 57 GP practices in the Hull area which spans 7,154 hectares and, as a city, has relatively tight geographical boundaries with most of the 'leafy suburb' areas outside Hull's boundaries in East Riding of Yorkshire. As a result, Hull has a relatively high deprivation score, as measured by the Index of Multiple Deprivation 2010, with Hull ranked as the 10th most deprived local authority out of 326 (bottom 4%).

The resident population of Hull is 256,406 based on the 2011 Census data and 265,369 residents based on estimates from the local GP registration file as at October 2011. This equates to approximately 37 residents per hectare. The Joint Strategic Needs Assessment (JSNA) identifies considerable inequalities in health between Hull and England, and between populations within Hull.

Age



Compared to England, Hull has lower percentages of residents aged 10-19 years and 55+ years, but slightly higher percentages aged under 5, 20-34 years and 45-54 years. There is a relatively large difference between Hull and England for the age group 20-34 years, due to Hull's colleges and Universities.

There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010. The number of deaths occurring to Hull residents has decreased

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	<p>from 2,571 to 2,310 between 2001 and 2010. ONS estimated the resident population to be 243,596 in 2001 compared to 260,424 residents based on the GP registration file, with the difference between these estimates narrowing over time. So, whilst it is difficult to quantify the exact increase in Hull's population, it has increased over recent years. Between 2010 and 2030, ONS estimate that Hull's population will increase from 266,100 to 311,900 residents, an increase of 17%.</p> <p>The figure above shows the population of Hull (2011 Census Data).</p>				
Race	<p>The percentage of the population from Black and Minority Ethnic (BME) groups has increased substantially since 2001. For the 2001 Census, it was estimated that 3.3% of Hull's population was not White British or White Irish, whereas Census data shows that this figure increased to 10.2% for 2011. There is no single BME group in Hull with much higher percentages compared to other groups. The 2011 census data shows:</p> <p>White British - 89.7% White Other - 4.4% Mixed - 1.3% Asian - 2.5% Black - 1.2% Other - 0.8%</p>				
Sex	<p>The gender split in Hull is approximately 50.1% men and 49.9% women. For 2008-2010, life expectancy in Hull was 75.7 years for men and 80.2 years for women compared to 78.6 years and 82.6 years for men and women respectively in England.</p>				
Gender reassignment	<p>No local information provided.</p>				
Disability	<p>According to the 2011 Census, it is estimated that approximately 19.7% of the Hull population lives with a long term health problem or disability compared with 17.6% for England. This information can be broken down further (Source: Projecting Older People Population Information System and Projecting Adult Needs and Service Information) to include learning disabilities, physical disabilities, hearing impairments and visual impairments, as follows:</p> <table border="1" data-bbox="507 1787 1401 1908"> <thead> <tr> <th>2012 Estimates</th> <th>Hull</th> </tr> </thead> <tbody> <tr> <td>Learning Disability (Age 18 – 64)</td> <td>4,078</td> </tr> </tbody> </table>	2012 Estimates	Hull	Learning Disability (Age 18 – 64)	4,078
2012 Estimates	Hull				
Learning Disability (Age 18 – 64)	4,078				

	Learning Disability (Age 65 and over)	762																				
	Physical Disability – Moderate (Age 18 – 64)	12,222																				
	Physical Disability – Serious (Age 18 – 64)	3,491																				
	Visual Impairment (Age 18 – 64)	108																				
	Visual Impairment (Age 65 and over)	3,263																				
	Hearing Impairment – Moderate or Severe (Age 18 – 64)	5,765																				
	Hearing Impairment – Moderate or Severe (Age 65 and over)	15,707																				
	Hearing Impairment – Profound (Age 18 – 64)	49																				
	Hearing Impairment – Profound (Age 65 and over)	402																				
Sexual Orientation	There are no local statistics for how many Lesbian, Gay or Bisexual (LGB) people live within Hull however, nationally, the Government estimates that 5% of the population are lesbian, gay, bi and transgender communities.																					
Religion, faith and belief	<p>According to the 2011 Census, 54.9% of the population have identified themselves as Christian and 3.1% of the population is made up of other religions. The remainder of the population did not state anything (7.2%) or stated 'no religion' (34.8%).</p> <table border="1"> <thead> <tr> <th>Religion</th> <th>2011</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>54.9%</td> </tr> <tr> <td>Buddhist</td> <td>0.3%</td> </tr> <tr> <td>Hindu</td> <td>0.2%</td> </tr> <tr> <td>Jewish</td> <td>0.1%</td> </tr> <tr> <td>Muslim</td> <td>2.1%</td> </tr> <tr> <td>Sikh</td> <td>0.1%</td> </tr> <tr> <td>Other Religion</td> <td>0.3%</td> </tr> <tr> <td>No Religion</td> <td>34.8%</td> </tr> <tr> <td>Religion Not Stated</td> <td>7.2%</td> </tr> </tbody> </table>		Religion	2011	Christian	54.9%	Buddhist	0.3%	Hindu	0.2%	Jewish	0.1%	Muslim	2.1%	Sikh	0.1%	Other Religion	0.3%	No Religion	34.8%	Religion Not Stated	7.2%
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Marriage and civil partnership	This protected characteristic generally only applies in the workplace. Data from the Office of National Statistics covering the period 2008-2010 indicates that there were 18,049 Civil Partnerships in England and Wales during this three-year period – 52% men and 48% women.
Pregnancy and maternity	There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010.

Equality Impact Analysis:

<p>Is any Equality Data available relating to the use or implementation of this policy, project or function ?</p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as ‘<i>Equality Groups</i>’.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <p>1: Application success rates <i>Equality Groups</i></p> <p>2: Complaints by <i>Equality Groups</i></p> <p>3: Service usage and withdrawal of services by <i>Equality Groups</i></p> <p>4: Grievances or decisions upheld and dismissed by <i>Equality Groups</i></p>	<p>Yes employee data has been used to support the monitoring of the impact of this policy in the future. The employee data is not included due to the low number of CCG employees and concern around anonymity.</p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p>List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function</p>	<p>Consultation has taken place both locally and nationally with Trade Unions and staff</p> <ul style="list-style-type: none"> • SLT • CCG Employees • JTUPF Sub group • JTUPF • Governing Body (approval)
<p>Promoting Inclusivity</p>	<p>This Policy does not directly promote inclusivity, but</p>

How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation

ensures all employees are treated in the same way.

Equality Impact Assessment Test:

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
Gender (Men and Women)	✓			Considered – neutral impact
Race (All Racial Groups)	✓			As the policy is written in English there is a potential impact on employees whose first language is not English and therefore may struggle reading the policy. However this potential impact is minimised due to the development of the ‘portal’ facilities detailed in the action plan and an expectation that employees should be able to comprehend all policy documents.
Disability (Mental and Physical)	✓			Considered – neutral impact
Religion or Belief	✓			Considered – neutral impact

Sexual Orientation (Heterosexual, Homosexual and Bisexual)	✓			Considered – neutral impact
Pregnancy and Maternity	✓			Considered – neutral impact
Transgender	✓			Considered – neutral impact
Marital Status	✓			Considered – neutral impact
Age	✓			Considered – neutral impact

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Action Planning:

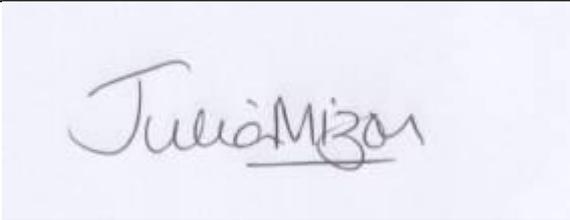
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
As the policy is written in English there is a potential impact on employees whose first language is not English and therefore may struggle reading the policy.	The CCGs Communication Team has developed the 'portal' to signpost individuals to alternative formats. As of January 15 there have been no requests for information in alternative formats, however this will be monitored.	CCG Communications	April 2016	Next policy review

Equality Impact Findings:	
Analysis Rating:	GREEN - As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.
Red – Stop and remove the policy	Red: As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.
Red Amber – Continue the policy	As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.
Amber – Adjust the Policy	As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.
Green – No major change	As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.

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Brief Summary/Further comments	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>
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Signatures	
Other Comments	
Confirmed by (manager): (Name and Title)	
Date:	17.03.15