



COSHH Policy

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Contents

1.0 Introduction.....	3
2.0 Aim.....	3
3.0 Definitions	3
4.0 Roles and Responsibilities.....	4
5.0 Procedures	4
5.1 Identify the hazards.....	5
5.2 Assess the risks	5
5.3 Control the risks.....	5
5.4 Elimination	6
5.5 Changing the process to reduce risks	6
5.6 Containment	6
5.7 Systems of work.....	6
5.8 Cleaning	6
5.9 Personal protective equipment.....	6
5.10 Information and training.....	6
5.11 Record findings.....	7
5.12 Review controls.....	7
6.0 Infection Control.....	7
6.1 Procedure when dealing with substances:.....	7
6.2 Checklist for Hazardous Substances:	8
6.3 Ensure that staff are aware of the precautions to be followed for:	8
6.4 Hazard Classification:	8
6.5 Health Risks:	8
7.0 Training Requirements.....	9
8.0 Monitoring.....	9
9.0 Related Policies and Procedures	9
10.0 Legislation and Guidance	9

1.0 Introduction

Re-Pat Ltd accepts that some work activities may involve the use of some hazardous substances which have the potential for harming health.

The law requires companies to adequately control exposure to materials in the workplace that cause ill health. This is the Control of Substances Hazardous to Health Regulations (COSHH Regs 2002).

The legislation applies to all people at work and other persons who may be affected by such work.

COSHH applies to virtually all substances hazardous to health except Asbestos and lead (which have their own regulations).

Re-Pat Ltd is registered with the Care Quality Commission (CQC) to provide transport services under the regulated activity of Treatment of Disease, Disorder or Injury (TDDI). This policy supports compliance with both COSHH and CQC Fundamental Standards, ensuring that hazardous substances are managed safely within the context of mobile healthcare delivery.

2.0 Aim

The aim of this policy is to highlight the risks of working with hazardous substances and what procedures are in place to prevent individuals being affected by exposure.

This policy will outline the steps required to reduce the risks as far as possible, and where the risks cannot be reduced and/or controlled provide information on a safe system of work.

3.0 Definitions

COSHH: Control of Substances Hazardous to Health Regulations.

A Hazard: is a danger or risk, something that can cause danger, or is dangerous.

A Risk: is a situation involving exposure to danger.

A substance that is hazardous to health: is simply any substance or mixture of substances (a preparation) which can cause, or has the potential to cause, damage to health.

Hazardous Substances are classified as:

- Very toxic
- Toxic
- Harmful
- Corrosive
- Flammable
- Explosive
- Sensitising or irritant
- Carcinogenic, mutagenic or teratogenic
- Biological agents

Some substances in use may not be significantly hazardous (e.g. general cleaning products), but all substances used in the transport environment must still be assessed for risk in line with COSHH.

4.0 Roles and Responsibilities

The Registered Manager has overall responsibility to ensure that individuals including staff, visitors and service users are not exposed to hazardous substances. The Registered Manager is ultimately responsible for ensuring compliance with the HASAWA 1974 and COSHH Regulations. 2002 and that this policy is effective.

They must ensure that they:

- find out what the health hazards are
- decide how to prevent harm to health using risk assessments
- provide control measures to reduce harm to health
- make sure they are used
- keep all control measures in good working order
- providing information, instruction and training for staff and others
- providing monitoring and health surveillance in appropriate cases
- planning for emergencies
- maintain a library of information on COSHH, particularly the most recent HSE EH40 publication.

In addition to general COSHH compliance, **the Registered Manager** must ensure that all hazardous substances used in the delivery of regulated transport services—such as medical gases, disinfectants, and clinical waste—are risk assessed and managed in accordance with CQC requirements and the TDDI framework.

Staff should understand the potential risks regarding substances in their place of work (information available on COSHH assessment) and have read and understood all related COSHH Risk Assessments and associated product safety data sheets.

Staff should make full and proper use of any precautions/safe systems of work put in place by their manager to eliminate/minimise the risk of exposure to substances hazardous to health. This includes wearing/using Personal Protective Equipment (PPE) in the manner for which it is intended, reporting any defects in PPE and withdrawing such items from use. Failure to do so is a breach of legislation and may result in disciplinary action against the individual.

Staff must report on an accident/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.

Staff must familiarise themselves with emergency procedures put in place by their manager.

5.0 Procedures

Many materials or substances used or created at work could harm our health and wellbeing. These substances could be dusts, gases or fumes that can breathe in, or liquids, gels or

powders that meet eyes or skin. There could also be harmful micro-organisms present that can cause infection, an allergic reaction or are toxic.

Harmful substances can be present in anything from paints and cleaners to dust, fumes, blood or waste. Ill health caused by these substances used at work is preventable. Many substances can harm health but used properly, they almost never do.

It is important to risk assess activities to reduce and prevent exposure taking place.

Given the nature of Re-Pat Ltd.'s operations as a mobile healthcare provider, COSHH risk assessments must consider the unique risks associated with confined transport environments. This includes the use and storage of medical gases, cleaning agents, and potential exposure to biological hazards during patient transfer.

These are the steps to take for risk assessment:

5.1 Identify the hazards

Identify which substances are harmful by reading the product labels and safety data sheets (SDS). If in doubt, contact the supplier.

Think about:

- processes that emit dust, fume, vapour, mist or gas
- skin contact with liquids, pastes and dusts

5.2 Assess the risks

Decide who might be harmed and how.

Think about:

- how staff, visitor or service users might be exposed (whether the substance can be breathed in, get onto or through the skin or can even be swallowed) and the effects of exposure by each of these routes
- how often people work with the substance and for how long
- anyone else who could be exposed - do not forget maintenance staff, contractors and other visitors or members of the public who could be exposed
- what is already being done to control the risks
- what further action is needed to take to control the risks
- who needs to carry out the action
- when the action is needed by

5.3 Control the risks

Once a risk assessment has been completed out and it has been identified which harmful substances are present, and how staff and others can be harmed, then an action plan is needed to prevent exposure.

5.4 Elimination

Things to think about:

Is this substance needed or required, or is a safer alternative available? Can the organisation change the process to eliminate its use or avoid producing it? If this is not possible, adequate control measures can be put in place to reduce exposure.

5.5 Changing the process to reduce risks

It is important to consider whether changes can be made to the process used to reduce the risk of exposure. For example, reducing the temperature of a process to reduce the amount of vapour getting into the air or use pellets instead of powders as they are less dusty.

5.6 Containment

It is important to think about enclosing the process or activity as much as possible to minimise the escape or release of the harmful substance

5.7 Systems of work

Restrict access to those people who need to be there. Plan the storage of materials and use appropriate containers. Check that storage containers are correctly labelled and that incompatible materials, such as disinfectants and oxygen, are stored safely in accordance with transport safety protocols.

5.8 Cleaning

Exposure to hazardous substances can occur during cleaning, so plan and organise the workplace so that it can be easily and effectively cleaned. Smooth work surfaces will allow easy cleaning. Have the right equipment and procedures to clear up spillages quickly and safely. Clean regularly using a 'dust-free' method – vacuum, do not sweep.

5.9 Personal protective equipment

Re-Pat Ltd will provide personal protective clothing and equipment, in combination with other control measures to ensure the safety and wellbeing of staff, service users and visitors. It is important to not automatically opt for personal protective equipment (PPE) as a control measure. It is not as reliable or effective as other measures.

5.10 Information and training

The Registered Manager must ensure that staff understand the outcome of risk assessments and what this means for them. The Registered Manager should communicate what the hazards and risks are, and any workplace exposure limits, and what staff need to do to protect themselves.

The Registered Manager must ensure that staff are aware of the results of any monitoring of exposure and the collective results of health surveillance.

The Registered Manager must train staff members to use controls and PPE correctly.

Staff members should know what to do if there is an accident (for example spillage) or emergency.

Contractors in the workplace also need to know what the risks are and how Re-Pat Ltd are controlling them. In addition, the manager needs to know if contractors are bringing hazardous substances onto the premises, and how they will prevent harm to everyone in the environment.

5.11 Record findings

If a company such as Re-Pat Ltd who has 5 or more employees, then the Registered manager must record risks, write down what steps taken to identify the risks. Make a list of the actions taken to control the risks to staff' health.

5.12 Review controls

Review the risk assessment regularly to ensure it's kept up to date and accounts for any changes in the workplace. The Registered Manager must review the controls put in place to make sure they are working.

The Registered Manager should also review them if they may no longer be effective or there are changes in the workplace that could lead to new risks such as changes to:

- staff
- a process
- the substances or equipment used

Also consider a review if staff have spotted any problems or there have been any accidents or near misses.

Update the risk assessment record with any changes that are made.

6.0 Infection Control

6.1 Procedure when dealing with substances:

It is important to be aware they have the possibility to cause harm. All substances must be purchased from a reputable supplier and be in their original containers (with the original label) which must have safety labelling or safety information (usually on the back of the bottle) and be legible and clear. Substances must not be decanted into other containers marked or unmarked. Only "domestic quantities" of substances should be stored and be in use at any one time.

In the context of patient transport, substances such as disinfectants and oxygen must be stored securely within vehicles, in accordance with COSHH and CQC guidance. All substances must be clearly labelled and used in line with manufacturer instructions and clinical safety protocols.

Compiling an Inventory within services and offices hazardous substances may be used as part of normal work activities e.g. cleaning materials used in vehicles or depots. An inventory must be kept in each site containing each type (not necessarily quantities) of substances used or handled. The Risk Assessment will easily double up as the inventory as all the chemicals in use will be listed. If possible, try to reduce the amount of chemicals used in each workplace

i.e. make use of “multi-purpose” cleaning agents as much as possible. It is recommended to keep an approved list of chemicals to be purchased. This stops Contractors and individuals over buying and creating stockpiles of different substances.

6.2 Checklist for Hazardous Substances:

- If the materials are hazardous consider whether they are required
- If the material is required, consider whether there are less hazardous forms (e.g. non bleach cleaning products)

6.3 Ensure that staff are aware of the precautions to be followed for:

- Using the substance
- Storing the substance
- Disposing of the substance
- What to do if a staff member or contractor comes into contact with the substance e.g. inhalation, splashes or ingestion.
- Risk Assessment each hazardous substance identified should be subject to a Hazardous Substance Risk Assessment and must not be used where there is no assessment in place.
- Hazardous substances must be kept in a lockable facility where there is the potential risk of an individual or member of Contractors being harmed by such substances.

Contractors must be aware that certain substances do not mix well with others and can create a dangerous situation. directions must be followed for each substance in use. If there are no or insignificant risks i.e. limited domestic products in small quantities used safely- there may be no need for a detailed risk assessment advice should be sought from the Health and Safety Manager.

6.4 Hazard Classification:

The information on the label and safety data sheet indicates whether the material is toxic, flammable or an irritant. This gives an immediate indication of the intrinsic hazard associated with the product group. The classification allocated and all the other information should be applicable to the most hazardous materials in the generic grouping.

6.5 Health Risks:

Indicate the key risks to the health of contractors and staff exposed to the material.

For example - a product carrying the risk phrase "Irritating to eyes" should be matched by the applicable precautions, "Avoid contact with eyes". Awareness of concentrated substances should also be highlighted – i.e. appropriate quantities/dilution etc.

Current Control Measures: Any measures that must be in place to minimise the risk e.g. protective equipment, specific method of use, contractors' instruction etc.

Use of Hazardous Materials used at work should be treated with respect, care being taken to read warning labels on containers and any written advice provided in assessments. Any worker who feels that the use of a material is causing any health problems should report this to his/her manager as soon as possible. If there is any suspicion that a worker may be affected

by the use of a material at work, the manager should refer the worker for occupational health advice or follow internal health and safety procedures.

Protective Equipment Protective equipment should only be provided as a last resort where there are no other alternatives but to deal with the risk. Contractors must use protective equipment specified in the assessment when handling hazardous substances e.g. wearing gloves when using oven cleaner.

Spillages In the event of any spillage of any substance care should be taken to ensure this is mopped up immediately and the area made safe. Reference should be made to any specific instructions from the manufacturers with regards to spillages accidental or otherwise.

7.0 Training Requirements

All staff should attend training in COSHH, infection control and health and safety in line with Re-Pat Ltd.'s training matrix.

Staff involved in the delivery of TDDI services must receive COSHH training specific to mobile healthcare environments. This includes the safe handling of medical gases, infection control procedures in vehicles, and emergency response protocols for hazardous substance exposure during transport.

8.0 Monitoring

This policy will be reviewed annually, or in the following circumstances:

- Changes in legislation and /or government guidance
- As required by the Local Authorities and / or regulatory bodies
- As a result of other significant changes or events

9.0 Related Policies and Procedures

Infection Control Policy

Health and Safety Policy

10.0 Legislation and Guidance

The Health and Safety at Work etc Act 1974

Control of Substances Hazardous to Health Regulations (COSHH Regs 2002).