



Review Sheet




Last Reviewed
13 Aug 2025



Last Amended
19 Dec 2024



This policy will be reviewed as needs require or at the following interval:
Annual

Business Impact:	 <p>Minimal action required. Circulate information amongst relevant parties.</p>
Reason for this Review:	Scheduled review
Changes Made:	No
Summary:	This policy will support Wellspring Recruitment and Care Services Limited in complying with the Control of Substances Hazardous to Health (COSHH) Regulations in all its activities, services and premises. It has been reviewed with no changes needed at this time. References have also been checked to ensure they remain current.
Relevant Legislation:	<ul style="list-style-type: none"> • Health and Safety at Work etc. Act 1974 • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) • The Workplace (Health, Safety and Welfare) Regulations 1992 • The Health and Safety (Miscellaneous Amendments) Regulations 2002 • The Control of Substances Hazardous to Health Regulations 2002 • The Management of Health and Safety at Work Regulations 1999 • Classification, Labelling and Packaging of Substances and Mixtures Regulations 2015 (CLP)
Underpinning Knowledge:	<ul style="list-style-type: none"> • Author: HSE, (2013), Control of Substances Hazardous to Health (Sixth edition) [Online] Available from: https://www.hse.gov.uk/pubns/books/l5.htm [Accessed: 13/08/2025] • Author: HSE, (2020), EH40/2005 Workplace Exposure Limits [Online] Available from: https://www.hse.gov.uk/pubns/books/eh40.htm [Accessed: 13/08/2025] • Author: HSE, (2013), Legionnaires' Disease. The control of legionella bacteria in water systems [Online] Available from: https://www.hse.gov.uk/pubns/books/l8.htm [Accessed: 13/08/2025] • Author: HSE, (2024), Control of Substances Hazardous to Health (COSHH) [Online] Available from: https://www.hse.gov.uk/coshh/ [Accessed: 13/08/2025]
Suggested Action:	<ul style="list-style-type: none"> • Encourage sharing the policy through the use of the QCS App



Equality Impact Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

Quality Compliance Systems
Wellspring Recruitment and Care Services Limited
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1. Purpose

1.1 To describe the arrangements in place at Wellspring Recruitment and Care Services Limited for ensuring that risks to the health and safety of all staff and Service Users from the use of hazardous substances in its premises and services, are effectively managed.

1.2 To describe how Wellspring Recruitment and Care Services Limited implements effective systems to ensure compliance with the Control of Substances Hazardous to Health (COSHH) Regulations in all its activities, services and premises.

1.3

Key Question

Quality Statements

SAFE	QSS4: Involving people to manage risks QSS5: Safe environments
SAFE	QSS8: Medicines optimisation
SAFE	QSS7: Infection prevention and control
WELL-LED	QSW5: Governance, management and sustainability
WELL-LED	QSW7: Learning, improvement and innovation

1.4 Relevant Legislation

- Health and Safety at Work etc. Act 1974
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Health and Safety (Miscellaneous Amendments) Regulations 2002
- The Control of Substances Hazardous to Health Regulations 2002
- The Management of Health and Safety at Work Regulations 1999
- Classification, Labelling and Packaging of Substances and Mixtures Regulations 2015 (CLP)



2. Scope

2.1 Roles Affected:

- All Staff
- Registered Manager
- Other management

2.2 People Affected:

- Service Users

2.3 Stakeholders Affected:



- Family
- Commissioners
- External health professionals



3. Objectives

3.1 To protect the health and safety of staff and Service Users at Wellspring Recruitment and Care Services Limited by assessing the risks presented by use of hazardous substances and ensuring that they are controlled effectively.

3.2 To carry out all activities at Wellspring Recruitment and Care Services Limited in a manner which avoids the use of hazardous substances, or where their use cannot be avoided, minimises the risk of hazardous exposure to employees or Service Users.



4. Policy

4.1 The Control of Substances Hazardous to Health Regulations (COSHH) require employers to control the risks which arise from use of substances that are hazardous to health.

Wellspring Recruitment and Care Services Limited will prevent or reduce workers' exposure to hazardous substances by:

- Deciding what the health hazards are
- Gauging how to prevent harm to health
- Providing control measures and making sure they are used
- Regularly monitoring control measures
- Providing information and training for employees and other relevant individuals
- Providing monitoring and health surveillance in appropriate cases
- Planning for emergencies

4.2 COSHH substances can take many forms and include:

- Chemicals and products containing chemicals
- Fumes, vapours, dusts and mists
- Gases and asphyxiating gases
- Biological agents - (packaging will have a hazard symbol)
- Nanotechnology

4.3 Wellspring Recruitment and Care Services Limited understands that using chemicals or other hazardous substances at work can put health at risk.

Wellspring Recruitment and Care Services Limited assesses the risk of the use of hazardous substances in its services and utilises control measures aligned to the following principles:

- Elimination and/or use of alternative, less hazardous substances and materials where possible
- Modification of the use or process to eliminate, isolate or reduce exposure



- Elimination and/or reduction of numbers of people exposed to the hazardous substance
- The outcome of any environmental monitoring, as appropriate, which has been undertaken by a competent person
- The provision, maintenance and use of any control equipment required
- Preparing plans and procedures to deal with accidents, incidents and emergencies
- Ensuring employees are properly informed, trained and supervised
- The use of Personal Protective Equipment (PPE) to reduce or control exposure to hazardous substances/materials. PPE should be regarded as a 'last resort' in providing protection from exposure to substances hazardous to health

Instances of failure to work safely or make proper use of control measures may result in action, subject to the Discipline Policy and Procedure at Wellspring Recruitment and Care Services Limited.

4.4 Managing Director

The Managing Director has specific accountability to ensure that responsibilities for Health and Safety, including the management of hazardous substances, are effectively assigned, accepted and managed at all levels in Wellspring Recruitment and Care Services Limited consistent with good practice. This duty is delegated to others within Wellspring Recruitment and Care Services Limited.

4.5 Health and Safety Lead

The Health and Safety Lead (Michael Omolola) is responsible for:

- Providing competent advice, information and training on health and safety legislation relating to hazardous substances
- Ensuring that occupational hygiene monitoring arrangements are in place for identified staff and teams
- Liaising with others, e.g. Occupational Health, Infection Control Lead as appropriate
- Reporting any notifiable disease associated with significant exposure to a substance to the Health and Safety Executive (HSE) as required under the Reporting of Incidents, Disease and Dangerous Occurrences Regulations (RIDDOR) 2013

4.6 Infection Control Lead

The Infection Control Lead is responsible for:

- Ensuring competent advice and support in relation to the control of infection arising from hazardous substances are provided to employees
- Ensuring that managers are made aware of any relevant advice required to enable continued safe working practice
- On request, assisting in investigating incidents relating to biological agents

4.7 Managers / Supervisors

Managers and supervisors have delegated responsibility for implementing the policy within their areas of responsibility. This includes but is not limited to:

- Bringing this policy to the attention of staff within their area of responsibility
- Compiling an inventory of hazardous substances
- Ensuring that COSHH assessments are carried out in their area of responsibility and are accessible to staff using the hazardous substances to which they relate
- Ensuring that staff have appropriate information, instruction and training before using hazardous substances and are familiar with how to use any control measures



- Selecting the correct type and specification of PPE where the risk assessment indicates that it is needed. The correct type and specification should be made using manufacturers' guidance. Further guidance about the selection and use of PPE can be found in the Personal Protective Equipment (PPE) Policy and Procedure
- Carrying out or arranging appropriate exposure monitoring and/or health surveillance where required

4.8 Employee Responsibilities

Employees must:

- Be aware of the contents of any COSHH Assessment relating to any substance that they may encounter in the workplace
- Follow any safe systems of work that have been identified in the assessment
- Take steps to minimise exposure to themselves and others
- Make full and proper use of control measures including reporting any defects
- Wear any PPE provided, including Respiratory Protective Equipment (RPE), correctly and in accordance with the manufacturers' instructions
- Co-operate with any health surveillance or monitoring as requested
- Promptly report all incidents concerning the use, storage, disposal or accidental release of hazardous substances in accordance with the Accident and Incident Reporting Policy and Procedure at Wellspring Recruitment and Care Services Limited



5. Procedure

5.1 In order to comply with the requirements of the COSHH Regulations, Wellspring Recruitment and Care Services Limited:

- Carries out risk assessments on the use of hazardous substances in the workplace
- Prevents or uses controls to reduce exposure to hazardous substances
- Identifies and selects suitable and effective control measures
- Provides information and training in the use of controls
- Ensures that there are arrangements to deal with accidents and emergencies
- Carries out exposure monitoring where required, as identified through risk assessment
- Carries out health surveillance where appropriate

5.2 COSHH and PPE

Managers at Wellspring Recruitment and Care Services Limited are responsible for ensuring that PPE is suitable for its intended purpose, appropriately maintained, cleaned, inspected, stored and replaced as required. Employees at Wellspring Recruitment and Care Services Limited are required to use the PPE provided in accordance with the training they have been given and report any faults/defects or concerns regarding PPE to their manager.

5.3 COSHH Assessment

COSHH assessments completed at Wellspring Recruitment and Care Services Limited identify the hazards and risks associated with the use of hazardous substances, as well as



details of precautions to be taken to control the risks associated with their use.

The COSHH Assessment Form at Wellspring Recruitment and Care Services Limited is completed for all substances in use. The form, together with the product safety data sheet (SDS), is retained in a suitable file or a designated computer-based folder.

5.4 Identify which Substances are Hazardous

- Compile a list of the substances used in a particular area. This will create an inventory
- Obtain a safety data sheet (SDS) from the material supplier or manufacturer
- Identify from the data sheets which substances are hazardous and why
- Consider whether the substance will be in the form of liquid, gas, dust, fume or mist. The data sheets will provide information about the type of hazard in the form of hazard symbols as required by the [Retained CLP Regulation \(EU\) No. 1272/2008 as amended for Great Britain, known as GB CLP](#)
- If the substance has been assigned a safe exposure limit in the HSE's [EH40](#) document, this will also indicate that a substance is hazardous in nature
- Include biological hazards such as bodily fluids (e.g. blood, vomit, urine)
- Include substances created by the process, including waste products

5.5 Decide who Might be Harmed and How

- Consider who might be exposed to the substance and for how long. This will include staff working directly with the substance, other staff working in the area, such as cleaners and maintenance staff as well as contractors or visitors who pass near to, or enter, the work area
- Examine work activities and work out what substances a member of staff may be exposed to, how often and for how long
- A separate risk assessment should be carried out for groups of employees who may be at increased risk, such as pregnant workers, young people under the age of 18 and members of staff with increased susceptibility due to allergies or health conditions, e.g. asthma or dermatitis

5.6 Prevent or Control Exposure

The main aim is to prevent exposure to hazardous substances, but where this is not possible or practicable, Wellspring Recruitment and Care Services Limited must adequately control exposure. The priority for addressing exposure is based on the level of risk. This should take into account:

- How hazardous the substance is
- How often individuals are exposed and for how long

Substances with low, short-term exposure limits, based on 15 minutes of exposure that are identified in the [EH40](#) document, generally have a more rapid or serious impact on health than those with a higher exposure limit.

5.7 The COSHH Regulations advocate a hierarchy of controls that must be considered in the following order:

Prevent Exposure:

- **Elimination:** The COSHH Regulations state that the most effective method of preventing exposure to hazardous substances is not to use the substance or to eliminate the production of hazardous waste or by-products. This could be achieved by changing or modifying the method of working so that the process causing exposure is not required



- **Substitution:** If the process cannot be eliminated, could an alternative, less hazardous substance be used instead? If not, could the same substance be used in a different form? For example, could a solid be used instead of a liquid or could pellets be used instead of a powder? These actions are a good step towards reducing exposure

Caution should be exercised when selecting alternative substances and any decision should be based on a balance between the existing and any newly created risks. For example, a new substance with a lower level of toxicity but increased flammability might be a greater risk than the original substance.

5.8 Control Exposure

Engineering Controls and Work Processes

This would include using processes that minimise the amount of the substance used or produced, or equipment that totally encloses the process. Engineering controls separate the individual from the process. Exposure can be minimised by controlling hazardous substances at their source, rather than once they have been dispersed into the workplace. For example, local exhaust ventilation (LEV) may be used to control airborne contaminants.

Administrative Controls

These include safe operating procedures, access permits, training and supervision. These are essential controls that do not sit in isolation but are used in combination with other controls. Staff must be provided with information about the hazards and risks associated with their work, and about the means of controlling those risks. Inexperienced staff may require close supervision to ensure that they understand the risks and the need for the controls (and how to use them). The level of supervision is a risk control which should be determined by the local manager.

Worker Specific Controls

These controls include the use of PPE such as protective clothing, face masks and respirators and limiting worker exposure by job rotation. Although a risk assessment may identify PPE as being necessary, other means of control should be given preference and, wherever possible, PPE must not be relied upon as the only means of protection. It is too user-dependent to be fully reliable and protects only the user.

5.9 Safety Data Sheets

- A data sheet must always be obtained for all hazardous substances. This will either be supplied to Wellspring Recruitment and Care Services Limited with the delivery note or can be found on the website when clicking on the item ordered. If one is not available, the supplier must be contacted directly to obtain one
- By law, suppliers of chemicals must provide an up-to-date safety data sheet if a substance is dangerous for supply
- The data sheet will be the basis of the COSHH risk assessment

5.10 COSHH Folder

- Wellspring Recruitment and Care Services Limited has an emergency plan in place for when incidents happen with hazardous substances. Instructions on what to do are stated on the data sheet and will be followed in the case of an emergency
- A dedicated COSHH file is available with all data sheets and risk assessments in alphabetical order
- Staff at Wellspring Recruitment and Care Services Limited are made aware of where the folder is kept in case of an emergency



- If an incident occurs where Wellspring Recruitment and Care Services Limited or Service Users are involved in a hazardous substance incident that requires hospital treatment, a copy of the data sheet must be sent with them to help the medical team

5.11 Managing Accidents and Emergencies

The safety data sheet (SDS) will provide information about suitable first aid responses for contact with the substance, any fire hazards and fire-fighting measures and how to deal safely with an emergency situation, such as a spillage.

5.12 COSHH Training

- Staff at Wellspring Recruitment and Care Services Limited are shown where the COSHH folder is and how to use it as part of their induction and training record
- COSHH is discussed and documented in meetings to inform the team of any changes in procedures or rules
- New hazardous substances at Wellspring Recruitment and Care Services Limited and safe ways to use them must be discussed with all team members

5.13 Dilution of Chemicals

- The dilution of cleaning chemicals will be avoided where possible, by sourcing pre-diluted products. However, where this is not possible, dilution will be carried out by a member of staff appropriately trained for the purpose
- Cleaning chemicals will be diluted according to manufacturer's instructions for the designated purpose
- Protective equipment will be worn in accordance with the COSHH assessment

Method

- Place containers at waist height
- Wear gloves, goggles and any other protective equipment as instructed by the risk assessment
- The room must have adequate ventilation at all times
- Use the measuring equipment supplied by the manufacturers
- Fill containers with the correct quantity of water; add liquid concentrate to diluting liquid - never the other way around, unless the instructions say so
- Diluted chemicals must be in clearly marked containers provided by the manufacturer so that there is no confusion as to what each dilution contains. Dilutions should be dated and signed by the staff member responsible for the dilution and this should be documented in the chemical log book under 'dilutions'
- Accurately measure the undiluted chemical into the measuring jug
- Seal the container of the undiluted chemical
- Pour the undiluted chemical into the container of water
- Seal the container of diluted chemical
- Wipe both containers to remove spillage
- Wipe the surface area used with a disposable cloth to remove any residual chemicals
- Return all containers to the desired location
- Wash and dry all utensils and store in the desired location
- Never add any other chemical to concentrates that contain bleach (sodium hypochlorite solution). This can cause a dangerous gas (chlorine) to be given off
- Ask your workers to check their skin for dryness or soreness every month - hand checks must be documented and signed in the hand check log book. Any concerns



must be followed through with appropriate referral to a skin specialist



6. Definitions

6.1 COSHH

- Control of Substances Hazardous to Health. COSHH law that requires employers to control substances that are hazardous to health

6.2 Product or Material Safety Data Sheet (PSDS / MSDS)

- A Safety Data Sheet (SDS), are documents that list information relating to occupational safety and health for the use of various substances and products



7. Key Facts - Professionals

Professionals providing this service should be aware of the following:

- Data sheets and risk assessments for hazardous substances must be readily available
- New stock must be monitored for hazardous substances and new risk assessments implemented where needed
- Staff at Wellspring Recruitment and Care Services Limited must know where the COSHH folder is and receive training on how it works (including any cleaners)
- New COSHH measures must be discussed in meetings to keep all the team up to date
- Risk assessments must be carried out for all hazardous substances
- The COSHH folder must be regularly maintained by a responsible person and any changes reported to the team



8. Key Facts - People Affected by The Service

People affected by this service should be aware of the following:

- Wellspring Recruitment and Care Services Limited keeps you safe by keeping records and risk assessments for any substances that have potential to cause harm



Further Reading

NHS - National Standards of Healthcare Cleanliness 2025:

<https://www.england.nhs.uk/estates/national-standards-of-healthcare-cleanliness/>



NHS - National Standards of Healthcare Cleanliness 2025 - Supporting Documents:

<https://www.england.nhs.uk/publication/national-standards-of-healthcare-cleanliness-supporting-documents/>



Outstanding Practice

To be "outstanding" in this policy area you could provide evidence that:

- The wide understanding of the policy is enabled by proactive use of the QCS App
- There is a named person responsible for COSHH
- The COSHH folder is updated regularly



Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
COSHH Risk Assessment - HS36	To complete a COSHH Risk Assessment.	QCS



COSHH Risk Assessment - HS36

This assessment only addresses the risk of harm to health from the substance listed.			
Assessment Date		Assessor Job Role	
Assessor Name			
Dates Reviewed			
Hazards Identified			
Name of Substance	Hazardous Properties	Quantity Normally Used	
Emergency Procedures			
Systems in place for the hazardous substance for the following:			
Eye contact:			
Inhalation:			
Skin contact:			
Ingestion:			





Spillage:
What is the hazardous substance used for?
How is the hazardous substance used?
How frequent is the hazardous substance used (e.g. hourly, daily, weekly, monthly)?
Who may be exposed?
Is health monitoring needed? Yes/No
Does the hazardous substance require special storage? If yes describe below: Yes/No
Does the hazardous substance require special disposal methods? Yes/No





What PPE is required to use the hazardous substance? (Mark appropriate)			
Gloves		Face Mask	
FPP3 Face Mask		Apron	
Protective Visor/Goggles		Other:	

Risk assessments must be monitored regularly and updated as necessary.