

# CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

Learning Academies Trust

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Approved by: Duncan Baldie  
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## CHANGES

Policy date	Summary of change	Author	Version	Review date
17/09/2020	Policy has been created.	Duncan Baldie	1.0	Autumn 2021

### 1. STATEMENT OF INTENT

At Learning Academies Trust we understand the importance of protecting the health and safety of all our employees and pupils.

The Control of Substances Hazardous to Health Regulations 2002, state that every employer should prevent the exposure of substances hazardous to health, to their employees. Where exposure cannot be prevented, employers should ensure that the exposure is adequately controlled, through the use of risk assessments and appropriate control measures.

In accordance with these regulations, the Trust has created this policy to ensure that all staff are aware of their roles and responsibilities for preventing ill health as a result of hazardous substances, and that adequate control measures are implemented and monitored at our schools.

The main aims of this policy are:

- To assess the risk of hazardous substances used in our schools and the impact they may have on health.
- To implement appropriate control measures in order to manage identified risks.
- To regularly monitor control measures and ensure that they are adequate, including the review of control equipment.
- To regularly monitor the extent to which staff and pupils are exposed to hazardous substances and conduct health surveillance where necessary.
- To provide training for members of staff on the hazards, risks and precautions needed for effective control.
- This policy is applicable to all full-time, part-time and supply staff, pupils, contractors, volunteers and work placement students.

#### COSHH Co-ordinator

The COSHH Co-ordinator for Learning Academies Trust is Duncan Baldie, Estates Manager with individual delegation as Deputy Roles for each individual school to the School Site Manager.

The Headteacher at each school retains the Responsible Person Role.

## 2. LEGAL FRAMEWORK

This policy has due regard to the related statutory legislation, including but not limited to the following:

- Health and Safety at Work etc. Act 1974
- Control of Substances Hazardous to Health Regulations 2002

This policy will also have due regard to the following guidance:

- HSE 'COSHH: A brief guide to the regulations' 2005

The schools will implement this policy in conjunction with our Health and Safety Policy.

## 3. DEFINITIONS

Hazardous substances:

- For the purpose of this policy, a hazardous substance is a substance which may cause ill health if inhaled, ingested, injected or absorbed through the skin, or as a result of being released into the surrounding environment.
- There are many examples of hazardous substances which can cause ill health, including:
  - Substances used directly in activities, e.g. cleaning agents, adhesives and paints.
  - Substances generated from activities, e.g. fumes.
  - Naturally occurring substances, e.g. grain dust.
  - Biological agents such as bacteria and other micro-organisms.

Health surveillance:

- For the purpose of this policy, health surveillance is a system of ongoing health checks for employees, in order to provide data to help employers evaluate health risks and highlight concerns in workplace control measures.
- Health checks are for employees who are regularly exposed to noise, vibrations, solvents, fumes, biological agents and hazardous substances.

Material Safety Data Sheet (MSDS):

- For the purpose of this policy, an "MSDS" is a document which provides important health and safety information regarding a substance. This is provided by the supplier or manufacturer, and indicates whether a substance is classified as hazardous.

## 4. ROLES AND RESPONSIBILITIES

The headteacher is responsible for:

- The day-to-day implementation of this policy and ensuring that all staff are aware of their roles and responsibilities, as well as the necessary control measures they need to undertake.
- Ensuring that members of staff receive effective COSHH training.
- Ensuring that, where possible, the use of hazardous substances is avoided.
- Conducting risk assessments where the use of hazardous substances cannot be avoided and ensuring effective control measures are in place.
- Providing less harmful alternatives, where possible, for hazardous substances which must be used.
- Ensuring that an up-to-date record is kept of all hazardous substances which are used in each school, and that these are clearly labelled.
- Providing safe storage and disposal arrangements for hazardous substances.

- Purchasing personal protective equipment (PPE), ensuring that this is regularly reviewed, is of an appropriate standard and in line with the Health and Safety Policy.
- Ensuring that health surveillance is undertaken where necessary.

3.2. The COSHH coordinator is responsible for:

- Conducting a formal assessment of the health risks to all those at our schools.
- Preventing and controlling the exposure of hazardous substances.
- Ensuring the proper use of controls, such as PPE, are adopted.
- Ensuring that the controls used are necessary, safe and regularly reviewed.
- Conducting health surveillance for staff where necessary.
- Providing instruction, information and training on the use of hazardous substances.

3.3. Other staff members are responsible for:

- Familiarising themselves with this policy and the procedures they must follow.
- Using all hazardous substances in accordance with the risk assessments conducted prior to use and the manufacturer's instructions, including the required control measures.
- Using PPE when necessary and reporting any damage to the COSHH coordinator immediately.
- Attending COSHH training sessions (or online equivalents)
- Making themselves available for any health surveillance and reporting any health and safety concerns to the COSHH coordinator immediately.
- Communicating the procedures and control measures to pupils.

3.4. Pupils are responsible for:

- Following the procedures as stated by their class teacher.
- Wearing the required PPE and adhering to the control measures.

## 5. COSHH PROCEDURES

In order for the Trust to be compliant with the COSHH regulations, we recognise the important procedures which need to be followed to ensure effective provision of COSHH at each of our schools

The Trust will dedicate itself to adhering to the following procedures for every hazardous substance used:

- Assessing the risks to staff and pupils:
  - Prior to use, the person responsible (Site Manager/Teacher) will conduct a risk assessment, taking into account the possible hazards that may occur as a result of using the substance.
  - In all instances, the potential risks must be considered and whether the use of the hazardous substance is important to the learning experience, or function required.
  - The risk assessment will detail the appropriate control measures that must be taken when using the substance, such as using appropriate PPE.
  - Risk assessments will be produced in conjunction with the MSDS and will take into account any individuals, including visitors, staff, pupils and contractors, who may be affected by its use.
  - The procedures and hazards identified in the risk assessment will be communicated to the required staff, who must then communicate this to all those involved and ensure it is adhered to.
  - Copies of the risk assessment will be given to the relevant members of staff. Copies will also be kept in the COSHH file for re-use, training and staff induction purposes.
  - Risk assessments will also be carried out for exposure to biological agents, e.g. vomit, blood, etc.
  - All risk assessments will be authorised by the Headteacher prior to the activity.

- Control measures:
  - The Trust will eliminate the use of any hazardous substances unless absolutely necessary.
  - All pupils will be fully aware of safety procedures and extra caution shall be taken when using any hazardous substances involved in teaching, for instance in science lessons.
  - Where substances must be used, the COSHH coordinator will aim to substitute this for a less harmful substance in order to minimise risks.
  - Where the substance cannot be eliminated or substituted, the amount of time for exposure will be minimised. The amount of the substance used will also be reduced as much as possible.
  - Where possible, the use of the substance will be in isolation from other areas of the school to prevent exposure to others.
  - Appropriate ventilation will be used, such as opening windows and external doors.
  - Appropriate PPE will be worn by all those exposed to the substance such as gloves, safety goggles, dust masks, etc.
  - When pupils are using a hazardous substance, at least two members of staff shall be present in order to supervise pupils and in the case of an emergency.
  - Hazardous substances will be stored safely and securely within cleaners cupboards or teaching space where it can be secured.
  - All substances will be safely disposed of after use by staff that are trained in COSHH.
  - Only staff trained in COSHH will have access to the substances. At no time will pupils be able to access the substances.
  - All substances shall be locked away, out of sight and reach of pupils, with only appropriate members of staff having approved access.
  - The school will follow the emergency procedure detailed in section 5 of this policy.
  - The COSHH coordinator will ensure that these control measures are adequately monitored and maintained.
  - Staff will be aware that they must report any defect in control measures to the COSHH coordinator immediately so that replacements can be provided.
  - All concerns regarding COSHH will be handled with the utmost importance and priority.
  
- Health surveillance:
  - In accordance with COSHH regulations, the school will conduct health surveillance in the following instances:
  - Where an individual is exposed to a substance which is associated with a disease or adverse health effect.
  - Where an individual is exposed to a substance which is likely to result in a disease or adverse health effect.
  - Where an individual displays signs of a disease or adverse health effect.
  - Health surveillance will be conducted by the COSHH coordinator, who will obtain all information of the individual's health and keep a written record of this. Records must be kept for a minimum of 40 years from the last entry.
  - The individual will be able to access their health records at any time they should request it.
  - All individuals at each school have a responsibility to provide honest and true health information, and declare any changes to their health that should occur due to the exposure of a hazardous substance.

## 6. PLANNING FOR ACCIDENTS, INCIDENTS AND EMERGENCIES

- The Trust will aim to effectively manage every identified risk that is involved with the use of a hazardous substance; however, we recognise that there may be instances when accidents, such as spillages, could occur and may be damaging to an individual's health.
- A detailed emergency plan will be established prior to the use of any substance by the headteacher as part of the risk assessment, who is responsible for communicating this to all those involved with the use of the substance.
- The COSHH risk assessment and the MSDS for each hazardous substance will be kept in the COSHH file so that all are aware of the emergency procedures and first aid.
- Incidents will be responded to promptly, and the harmful effects will be minimised where possible.
- Emergency services will be contacted immediately where the incident cannot be resolved by a trained member of staff.
- Only members of staff trained in COSHH and first aid should attempt to provide appropriate treatment for the individual.
- Any accidents that occur should be reported to the headteacher immediately, using an Accident Reporting Form, which are available from the office.
- The emergency procedure will be regularly practiced as part of a 'safety drill' method, to ensure all individuals at each school are aware of the steps that must be followed.

## 7. TRAINING OF STAFF

The COSHH coordinator will ensure training for staff is undertaken on an annual basis and will ensure that all staff are aware of:

- The names of the substances they work with and could be exposed to, as well as the associated risks and the use of MSDS.
- The appropriate precautions and control measures that they are expected to take to protect themselves, pupils and others at the school.
- The importance of PPE and how this should be used.
- The results of any exposure and health surveillance, whilst maintaining confidentiality and not revealing any identities.
- The correct measures taken when supervising pupils or staff who are handling substances.
- The emergency procedures which need to be followed.
- The COSHH Co-ordinator will ensure the policy is reviewed and reinforced at least annually via Team Meetings

Training will also be conducted in response to any changes required to the provision of COSHH, e.g. additional information required on risk assessments, new PPE equipment, etc.

## 8. MONITORING AND REVIEW

This policy will be reviewed on a biannual basis by the Trust in conjunction with the COSHH coordinator, who will make any necessary changes and communicate this to all staff.

The COSHH coordinator will conduct an annual audit to review the provision of COSHH in our schools. The COSHH coordinator will review the following:

- All hazardous substances being used, stored, or transported have been assessed in relation to their MSDS, and are recorded on the COSHH register.
- The COSHH register does not contain any substances which are no longer used, or are out-of-date.
- The storage of hazardous substances is safe and secure, and all are clearly labelled.
- The appropriate control measures are employed as required.
- The practice of health surveillance, and how and where it is carried out, e.g. in a science lesson.
- The emergency procedures in place are followed and are functional.