



Control of Substances Hazardous to Health (COSHH) Policy v3

Strive for Education

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Statement of intent

Strive understands the importance of protecting the health and safety of its employees, pupils, visitors and contractors.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 require employers to prevent their employees from being exposed to substances hazardous to health. Where exposure cannot be prevented, employers must ensure that the exposure is adequately controlled through risk assessments and appropriate control measures.

In accordance with the regulations, the school will ensure that all members of 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 the school.

This policy aims to help the school:

- Assess the risk of hazardous substances used in the school and the impact they may have on health.
- Implement appropriate control measures in order to manage identified risks.
- Regularly monitor and review control measures to ensure that they are adequate.
- Regularly monitor the extent to which staff and pupils are exposed to hazardous substances and conduct health surveillance where necessary.
- Provide training for members of staff on the hazards, risks and precautions needed for effective control.

1. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- The Health and Safety at Work etc. Act 1974
- The Control of Substances Hazardous to Health Regulations 2002 (as amended 2004)
- HSE (2012) 'Working with substances hazardous to health'
- HSE 'UK REACH Work Programme'

This policy operates in conjunction with the following school policies:

- Health and Safety Policy
- Risk Assessment Policy
- First Aid Policy
- Asbestos Management Policy
- Manual Handling Policy
- Contractors Policy

2. Definitions

For the purposes of this policy, a **"hazardous substance"** is any substance which may cause ill health if inhaled, ingested, injected, absorbed through the skin, or as a result of being released into the surrounding environment. Examples of hazardous substances which can cause ill health include:

- 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, e.g. bacteria and other micro-organisms.

For the purposes of this policy, **"health surveillance"** is a system of ongoing health checks for employees, conducted to help employers evaluate health risks and highlight concerns in workplace control measures. Health checks will be carried out for employees who are regularly exposed to hazardous substances such as solvents, fumes, and biological agents.

For the purposes of this policy, a **"Material Safety Data Sheet (MSDS)"** is a document which provides important health and safety information regarding a substance. The MSDS is provided by the supplier or manufacturer, and indicates whether a substance is classified as hazardous.

3. Roles and responsibilities

The Headteacher is responsible for:

- Overseeing the day-to-day implementation of this policy.
- Ensuring that all members of staff are fully aware of their roles and responsibilities in relation to this policy, as well as the necessary control measures they are required to undertake.

- Ensuring that relevant members of staff receive effective COSHH training.
- Ensuring that, where possible, the use of hazardous substances is avoided.
- Ensuring that risk assessments are completed where the use of hazardous substances cannot be avoided and effective control measures are in place.
- Ensuring that an up-to-date record is maintained of all hazardous substances used in the school, and that they are clearly labelled.

The Operations Director is responsible for:

- Providing safe storage and disposal arrangements for hazardous substances.
- Purchasing personal protective equipment (PPE) and ensuring that this is regularly reviewed, of an appropriate standard, and in line with the Health and Safety Policy.
- Conducting assessments of the health risks to all those at the school.
- Preventing and controlling the exposure of hazardous substances.
- Ensuring the proper use of control measures, e.g. PPE, is 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.

All members staff are responsible for:

- Familiarising themselves with this policy.
- Where relevant to their role, using 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 site manager immediately.
- Attending COSHH training sessions where required.
- Ensuring they are available for health surveillance where necessary.
- Reporting any health and safety concerns to the Operations Director immediately.
- Communicating COSHH procedures and control measures to pupils where needed.

4. COSHH procedures

The school will recognise the important procedures which need to be followed to ensure effective provision of COSHH, in line with regulations.

Prior to using a hazardous substance, the Operations Director 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 Operations Director will consider potential risks and whether the use of the hazardous substance is important to the learning experience. The risk assessment will describe the control measures taken when using the substance, such as using appropriate PPE. Risk assessments will be produced in conjunction with the MSDS and consider any individuals who are likely to be affected by its use.

The procedures and hazards identified in the risk assessment will be communicated to relevant members of staff, with copies of the risk assessment provided. Copies are also kept in the COSHH register for re-use, training and staff induction purposes.

Risk assessments will also be carried out for exposure to biological agents, e.g. vomit and blood.

All risk assessments are reviewed on a termly basis by the Headteacher and any further necessary information is added.

5. Control measures

The school will eliminate the use of any hazardous substances unless absolutely necessary.

Where the school has hazardous substances, it will manage the risks to staff and pupils and have risk assessments in place. COSHH risk assessments will cover the following areas:

- Identifying hazards.
- Identifying who may be harmed and how.
- Evaluating risks and developing control measures.
- Recording findings and implementing control measures.
- Reviewing the risk assessment regularly and updating when necessary.

All pupils will be made fully aware of the safety procedures. Extra caution will be taken when using any hazardous substances involved in teaching, e.g. in science lessons. When pupils are using a hazardous substance, at least three members of staff will be present to supervise pupils and handle potential emergencies.

There is an increased legal focus on mental health from the HSE and government bodies and employers must carry out risk assessments where stress or psychological harm could occur as a result of physical or mental health risks in the workplace, including those associated with hazardous substances. Employers must conduct risk assessments to identify and evaluate hazards, risks and implement control measures to eliminate or minimise risks.

In order to minimise risks, the Operations Director will aim to substitute hazardous substances for less hazardous alternatives, where these are available. Where substances cannot be eliminated or substituted for less hazardous alternatives, the amount of time for exposure will be minimised and the amount of the substance used will be reduced as much as possible.

Where possible, substances will be used in isolation, away from other areas of the school, in order to prevent exposure to others. Appropriate ventilation, e.g. opening windows and external doors, will be used. Appropriate PPE will be worn by all those exposed to the substance.

Hazardous substances will be stored safely and securely in the downstairs storage. Substances will be locked away, out of sight and reach of pupils, with only appropriate members of staff having approved access. Only staff trained in COSHH will be given access to hazardous substances – pupils will not be permitted to access hazardous substances.

After use, substances will be safely disposed of by staff trained in COSHH.

The Operations Director will ensure that control measures are adequately monitored and maintained. Members of staff will report any defect in control measures to the Operations Director immediately. All concerns regarding COSHH will be handled with the utmost importance and priority.

The Operations Director's checks on control measures, and any actions taken to remedy faults, will be recorded in a logbook and kept for at least five years.

In line with the 'UK REACH Work Programme', the school will assess and manage risks associated with chemicals it stores and uses.

6. 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 Operations Director, who will obtain all the information on the individual's health and keep a written record of this. Records will be kept for a minimum of 40 years from the last entry. The individual concerned will be able to access their health records at any time they should request it.

The school will recognise that health surveillance may need to be carried out by the nurse; in these instances, the same procedure will be followed.

All individuals at the school will be made aware that they have a responsibility to provide honest and true health information, and should declare any changes to their health that occur due to the exposure of a hazardous substance.

7. Planning for accidents and emergencies

The school will aim to effectively manage every identified risk involved with the use of a hazardous substance; however, 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. The risk assessment undertaken for each hazardous substance will be kept with the related substance, so that members of staff are aware of the emergency procedures and first aid.

Incidents will be responded to promptly and any 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 will attempt to provide treatment to an individual, following the procedures outlined in the First Aid Policy.

Emergency procedures will be practised regularly as part of a 'safety drill' method, to ensure that all individuals at the school are aware of the steps to follow.

Accidents and emergencies will be reported to the Headteacher immediately using the appropriate form.

8. Training

The Operations Director will arrange training for staff on a termly basis, ensuring 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 it should be used.
- The results of any exposure and health surveillance, whilst maintaining confidentiality and not revealing any identities.
- The correct measures to take when supervising pupils who are handling substances.
- The emergency procedures.

Training will be updated in response to any changes required to the provision of COSHH, e.g. additional information required on risk assessments or new PPE equipment, as well as in response to any incidents occurring at the school. All training that is delivered needs to be up-to-date, including the training records.

9. Monitoring and review

This policy will be reviewed annually by the Operations Director and the Headteacher. Any changes to this policy will be communicated to staff and relevant stakeholders.

The scheduled review date for this policy is July 2027.