Thistly Meadow Primary School
CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

Leicestershire Traded Services

Control of Substances Hazardous to Health

Information and Guidance

Author: Jessica Wenham
Reviewed by Tony O'Brien / Amy Walling
Issue Number: 7
Date Reviewed: 06/12/2019
Review due date:
06/12/2022

We can do that.

Table of Contents

SECTION	TITLE	PAGE
1.0	Introduction	3
2.0	Organisation	4
3.0	Controlling Substances Hazardous to Health	5
4.0	Obtaining and Storing Chemicals in Schools	9
Appendix 1	Hazard Identification Form	10
Appendix 2	COSHH Assessment Form	11
Appendix 3	Inventory of Substances	13
Appendix 4	Safety Data Sheets (Symbols)	14

1.0 Introduction

1.1 The Control of Substances Hazardous to Health (COSHH) Regulations 2002 provides the legal framework to protect people against health risks from hazardous substances at work. The regulations require employers to adequately assess the risk to health arising from work activities, to control exposure to hazardous substances and to protect both staff and others, who may be exposed, including the environment.

1.2 The term hazardous substance describes a wide range of substances with the potential to cause harm if they are inhaled, ingested, injected or absorbed through the skin or released into the environment. Common substances such as cleaning materials, herbicides and pesticides can be hazardous and/or harmful to the environment.

1.3 Hazardous substances occur in the following forms from packaged item or work process:

- Substances or a mixture of substances classified as dangerous which carry warnings such as Toxic, Very Toxic, Harmful, Corrosive, Irritant, Sensitising or Carcinogenic.
- Substances with Workplace Exposure Limits (WEL's). Workplace Exposure Limits have replaced the Maximum Exposure Limit (MEL) and Occupational Exposure Standard (OES). Substances with Well's are listed in HSE guidance via the following website; http://www.hse.gov.uk/pubns/books/eh40.htm
- Biological agents (bacteria, viruses and other micro-organisms).
- Any kind of dust in a specific concentration.
- Any other substances which create a risk to health, e.g. liquids, vapours, gases, mist, fibres, solids or smoke.

Some substances are excluded from the COSHH regulations but are covered by their own specific regulations. These include:

- Radioactive materials
- Asbestos
- Lead and lead products
- Material hazardous due to flammability only (these fall under Dangerous Substances and Explosive Atmosphere Regulations (DSEAR)
- Substances used for medical treatment.

1.4 The purpose of this procedure is to detail how substances hazardous to health will be controlled within Thistly Meadow. This procedure has been prepared to assist members of staff manage substances hazardous to health, work safely and prevent accidents and injuries.

2.0 Organisation

2.1 The responsible person(s) for Health and Safety within Thistly Meadow Primary School is the Head teacher and has the following responsibilities;

- Identifies the hazardous substances used in the school,
- Determines the risks from using any substances and implements suitable controls at each stage of the process,
- Considers whether the substances are definitely needed or whether safer substances could be used,
- Undertakes risk assessments (COSHH assessments) to account for all working practices in the school in which hazardous exposure may occur,
- Prevents people being exposed to hazardous substances, but where this is not possible, controlling the exposure,
- Restricts the use of hazardous substances to nominated staff,
- Decides what precautions are needed before starting work with a hazardous substance,
- Communicates COSHH risk assessments with those affected and notify the individuals of any actions to be taken.
- Arranges health surveillance as required in conjunction with staff members affected.
- Keeps all health surveillance records for a minimum of 40 years from date of last entry,
- Allows employees to have access to their own health records,
- Liaises with health and safety staff as required.

2.2 All members of staff that come into contact with hazardous substances have the following responsibilities: -

- Familiarising themselves with the relevant COSHH risk assessments, safety data sheets and relevant policies,
- Attending instruction and training in the use of/contact with substances,
- Reporting any health symptoms arising from their work material to their line manager, e.g. skin irritation, breathing problems,
- Using all control measures (i.e. ventilation, PPE) provided in the manner shown in their training. Following recommended dilution rate and not decanting where possible,
- Wearing/storing appropriate PPE if provided, as designed, including carrying out maintenance and cleaning as required,
- Reporting any defects in PPE provided, to a line manager.
- Assisting in the compilation of risk assessments (where required),
- Making themselves available for any health or medical surveillance deemed necessary in relation to the substances,
- Ensuring good standards of hygiene.

3.0 Controlling Substances Hazardous to Health

Within Thistly Meadow substances hazardous to health are controlled in a variety of ways.

3.1 Identifying Hazards to Health

The title(s) of responsible person(s) within Thistly Meadow will ensure that an inventory of substances used within the school is maintained. All substances purchased and used by the school will be included in this inventory. The following details will be included in the inventory:

- Trade name of product
- Name and contact details of supplier
- Amount bought per annum
- Any hazard classification labelling
- Intended use

The responsible person shall ensure any new product ordered comes with its own Safety Data Sheet (SDS). **Note: A Safety Data Sheet is not a risk assessment.**

Safety data sheets are available from the manufacturer or supplier and they both have a legal duty to supply such information. Safety data sheets can also be found on the internet.

A Safety Data Sheet contains 16 sections containing information on items such as physical properties, likely reactions to heat and other substances, storage, fire precautions, first aid actions and PPE required etc.

A Safety Data Sheet will help you complete the COSHH assessment. Please note that simply having a Safety Data Sheet is not regarded as having completed a COSHH assessment.

3.2 Risk Assessment

A COSHH assessment is an assessment of risk and control measures to members of staff and others affected by the substance. A COSHH assessment will be completed for all activities involving hazardous substances.

Guidance on Blood Borne Viruses hazards that may be encountered can be found in the Blood Borne Viruses and Needle Stick Injury Information and Guidance Document.

The COSHH risk assessment will be completed by using the following method:

- **Activity/Task** - Give a brief description of the process or activity. The whole process shall be assessed, not the individual substances. The

checklist in **Appendix 1** of this procedure will help identify the hazards. This should be done by using the Safety Data Sheet.

- It is important to consider each stage / step of the task / activity and not just the end use. Where necessary additional assessments should be made and the following considered; storage of bulk chemicals and bunding, how chemicals arrive on site / delivery arrangements, decanting of chemicals into smaller vessels, emergency procedures in the event of spillage, the storage of other chemicals, unauthorised access to chemical store – this list is not exhaustive and will require sites to consider risks specific to them.

- **Activity Hazards** – All known hazards from the process and hazardous substances associated with the task will be listed, including the risks from mixing substances and any dust / fumes produced as part of the process. The Hazard Identification Form (**Appendix 2**) at the back of this guidance may help you with this part of the risk assessment.

- **Possible Exposure** – List of those that may be exposed to the risks involved in the process or use of hazardous substance or material.

- **Existing Controls** - The control measures currently in place to reduce exposure to the hazardous substances will be considered here. This will include PPE, ventilation, providing information, instruction and training, safe systems of work etc. Emergency procedures will also be considered.

- **Assessment of Risk *(Risk Rating)*** – The assessor will make a judgement taking into account all factors and deciding on whether the remaining risk is high, medium or low, by using the matrix within the risk assessment.

- **Further Control Measures** – If additional controls can be introduced to eliminate or reduce exposure further, the details will be listed here and the risk assessment process should be repeated once these measures are in place.

If a COSHH risk assessment is required, this must be undertaken by the Head Teacher/Manager together with someone who is familiar with the systems of work within the area being assessed. Copies of the assessment must be readily available so that in the event of an incident, the correct emergency action or first aid measures can be taken.

New or expectant mothers will receive a documented individual risk assessment considering all the hazards associated with activities undertaken. Where applicable advice on using substances will be sought and included in the risk assessment as the mother or unborn child may be at risk.

Remember that hazards and risks are not limited to substances labelled as ‘hazardous'.

3.3 Control Measures

An important part of the process of a COSHH risk assessment is the identification of effective control measures. All control measures must perform as intended and continue to prevent or adequately control the exposure to substances hazardous to health. If controls are found to be inadequate and therefore could result in reduced efficiency, effectiveness or levels of protection for staff. The following is the hierarchy of control measures which will be considered.

- **Elimination** – does the substance have to be used? If not, it should be disposed of correctly; if necessary seek advice from supplier.
- **Substitution** – could another (less hazardous) substance be used instead?
- **Reduction** – can reduced amounts be used?
- **Isolation/Enclosure** – e.g. redesigning the working environment to contain the substance.
- **Local Exhaust Ventilation (LEV)/General Ventilation** – e.g. fume cupboard or just opening windows and doors to provide natural ventilation.
- **Safe Systems of Work** – staff to be aware of procedures for using substance safely and protecting themselves in normal and emergency circumstances. Safe systems of work may specify the need to limit the length of exposure or just good standards of hygiene housekeeping – e.g. staff to be responsible for putting away substance after use.
- **Information/Instruction** – training must be given to staff and others (e.g. contractors, visitors) on the substances, the risks, the methods of control, any personal protective equipment (PPE) required and emergency measures.
- **Supervision** – staff to be supervised in their work activities to ensure that they are following safe systems of work and are applying the training received.
- **Personal Protective Equipment (PPE)** – this is provided as a last resort because it only protects the individual wearing it. It must be suitable for the task and conditions. If PPE is provided it must be worn in the manner it is designed for. The risk assessment should identify the PPE required.

3.4 Storage

- Stocks of substances will be kept to a minimum, used in date order and within the expiry date.

- Substances will be stored and labelled correctly in accordance with the manufacturer's instructions. Appropriate hazard signs will be provided on all storage areas/cupboards where a risk has been identified.

- Substances will be disposed of correctly e.g. hazardous waste, recycling of containers as indicated on the safety data sheet.

3.5 Maintenance

It is essential that control measures are kept in good working order. The responsible person will ensure that any local exhaust ventilation system (LEV) is thoroughly examined at least once every 14 months, dated and a signed record is kept. Records should be kept for at least five years.

3.6 Information, Instruction and Training

Members of staff responsible for undertaking a COSHH assessment will receive suitable and sufficient training. This training shall be repeated periodically. It is recommended to be refreshed every 3 years.

All employees who work with substances hazardous to health shall receive suitable and sufficient information, training and instruction. This includes cleaning and maintenance staff, Science and Design & Technology staff and temporary or agency staff. The minimum requirement is for them to understand the outcome of the risk assessments and what this means for them. They should understand:

- what the hazards and risks are
- about any workplace exposure limit
- the results of any monitoring of exposure
- the general results of health surveillance
- what to do if there is an accident (e.g. spillage) or emergency

Employees will have access to safety data sheets. Training records will be maintained on site.

Contractors will be made aware of substances hazardous to health stored on site, what the risks are and how they are controlled. The Premises Officer will ask contractors if they are bringing hazardous substances onto the premises and what control measures they put in place to prevent harm to themselves, staff, students and visitors to the school site.

3.7 Health Surveillance

Health surveillance is any activity which involves obtaining information about employees' health and which helps protect employees from health risks at work. Where health surveillance is necessary the Head teacher shall arrange it to be carried out in the form of suitable tests, questionnaires, and examinations. Results will be interpreted by a competent person and action taken to eliminate or further control exposure.

The Head teacher will report any work related disease to the Health & Safety Executive (HSE) when they receive a written diagnosis from a doctor that they or their employee is suffering from an occupational disease listed in the

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 and the sufferer has been undertaking the work activities listed in the regulations, as part of their role.

3.8 Planning for Emergencies

In the event of an emergency involving a hazardous substance, the Head teacher must take immediate steps to:

- Assess the situation
- Make the area safe
- Contact the first aider (if required)
- Minimise the effect of the event
- Inform any staff who may be affected
- Restrict access to the affected area to essential personnel only and provide with the necessary PPE until the situation returns to normal

Where necessary details of emergency procedures, including a spills procedure, must be documented, communicated to staff and displayed in the workplace. In addition, it should be tested, reviewed and revised periodically. A log of emergency situations and near misses will be kept at the site/facility/establishment.

3.9 Monitoring and Review

It is the responsibility of the Head teacher to ensure that risk assessments are undertaken, kept up to date and reviewed:

- When there has been a change in work procedure
- If the substance is used for a different task
- If a substance has changed, e.g. new safety data sheet received
- Upon HSE direction
- Following any adverse incident involving the substance or task.

As part of the reviewing of COSHH risk assessments, new safety data sheets should be obtained. Previous COSHH risk assessments should be kept as long as necessary, dependent upon the chemicals being used. COSHH risk assessments should be available as part of the monitoring and audit process.

4.0 Obtaining and Storing Chemicals in Schools

4.1 For further information on safe storage and disposal of hazardous materials and chemicals within schools please see the Department for Education document 'Safe storage and disposal of hazardous materials and chemicals'. This document is a non-statutory guidance for school leaders, governing bodies, academy trusts and local authorities.

Appendix 1: Hazard Identification Form

Hazard Type					Physical Hazards												Chemical												Biological						Environmental						Psychological						Other				
Dept:	Service:	Site Name:	Manager:	Hazard:	Slips and Trips	Work at Height	Falling Items	Manual Handling	Contact with Equipment	Display Screen Equipment	Contact with Vehicles	Fire / Explosion	Noise	Vibration	Repetitive Strain Injury	Radiation Exposure	Inhalation of hazardous substances	Absorption of Hazardous substances	Ingestion of Hazardous Substances	Exposure to Asbestos	Exposure to Pesticides	Exposure to Lead	Exposure to Allergens	DSEAR	Other:	Other:	Other:	Other:	Legionella	Hepatitis	Contact with Blood	Contact with Needle-sticks	Exposure to Vomit	Exposure to food borne Pathogens	Hot Weather Working: Sunburn / Dehydration	Exposure to the Cold: Hypothermia / Illness	Inadequate Space to Work	High Winds / Rain Affecting Operations	Inadequate Lighting	Inadequate Ventilation	Bullying / Intimidation	Violence and Aggression	Workplace Demands	Major Incident Trauma	Emotional Engagement with Service Users	Lack of Communication / Management	Lone Working	Home Working	Occupational Road Risk	Control of Contractors	Mini Bus Safety
Activity:																																																			

Appendix 2

COSHH Assessment Form

This document **MUST** be retained for a minimum of **40 years.**

Leicestershire Traded Services
Health, Safety and Wellbeing

Before beginning work on the COSHH assessment process ensure you have a copy of the latest Safety Data Sheet (SDS) for the substance. SDS's are available from suppliers and manufacturers of your products.

Name of Substance	

Indicate below which form the substance takes:
Consideration to be made when using in different forms e.g. liquid to mist from spray bottle or fuel(liquid) to vapour

☐ Gas ☐ Vapour ☐ Mist ☐ Fume ☐ Dust ☐ Liquid ☐ Solid ☐ Other State

Classification (place an x in the box next to the appropriate sign):
For a fuller understanding of symbols, abbreviations, risk and safety phrases click on this link http://www.hse.gov.uk/coshh/detail/coshh-clp-reach.htm

 Acute Toxicity ☐	 Health hazard ☐	 Flammable ☐
 Corrosive ☐	 Serious long term health hazard ☐	 Hazardous to the environment ☐
 Explosive ☐	 Oxidising ☐	 Gases under pressure ☐

Can you eliminate the use of this hazardous substance? If Yes, stop the use of the substance and arrange for adequate disposal.	Yes ☐	No ☐
Is it possible to use a less harmful substance to do the work? (Contact your supplier for more information). If Yes, ensure a COSHH risk assessment is completed for the new substance.	Yes ☐	No ☐

Describe the activity or work process:		How long?	How often?	How much?
Note: Include how long the task will take, how often it will be repeated and how much of the substance is used.				
Department & Location(s) of work process:				

Persons at risk:	Employees ☐	Pupils ☐	Vulnerable Persons ☐	Other e.g. members of public ☐

Indicate below which route(s) of exposure the substance takes:
Inhalation ☐ Skin ☐ Eyes ☐ Ingestion ☐ Other? ☐ (Please state)_____

Workplace Exposure Limits (WELs)

Long-term exposure level (8hr TWA):	Short-term exposure level (15 mins):

List the risks to health and all known hazards below from exposure to the substance. Click here for risk phrases http://www.hse.gov.uk/chip/phrases.htm

Control Measures: List below control measures e.g. extraction, ventilation, supervision, include additonal controls for vulnerable persons where necessary.

	NOTE : Certain substances can react adversely when they come into contact with others, please list any compatibility warnings here:

Is health surveillance or monitoring required? (remember health surveillance may be required for vulnerable persons e.g. pregnant/young workers those with asthma, dermatitis etc.) **If Yes, please notify your manager.**	Yes ☐	No ☐

Personal Protective Equipment identify type and specification:

☐ Dust mask		☐ Visor	
☐ Respirator		☐ Goggles	
☐ Gloves		☐ Overalls	
☐ Footwear		☐ Other	

First Aid Measures (please give details below):

Inhalation:	Ingestion:
Skin Contact:	Eye Contact:

Fire; identify appropriate fire extinguishers, fire fighting Media and measures to contain/extingusih a fire?	During combustion substances may give rise to harmfull vapours / gases etc please detail below;
Dry Powder ☐ CO2 ☐ Water ☐ Foam ☐ Fire Blanket ☐	

Storage; how and where should items be stored?

Disposal of waste substances & containers please indicate below

Hazardous Waste ☐ General Waste ☐ Biological Waste ☐ Return to Supplier ☐ Other ☐

What is the process of disposing the waste?

Is exposure adequately controlled? If No, stop the use of the substance and contact your manager.		Yes ☐	No ☐
Risk Assessor(s) Name(s):		Risk Assessor(s) Signature(s):	
Authorised By:		Authoriser Signature:	
Date Conducted:		Date Review Required:	Date of Last Review:
		Date Review Required:	Date of Last Review:
		Date Review Required:	Date of Last Review:

Appendix 3: Inventory of Substances Template

Product List – (Insert School/Academy Name)					
Substance/Trade name of product	**Name and address of supplier**	**Amount bought per annum**	**Hazard classification labelling**	**Intended use**	**Other information**

Appendix 4 GHS & CLP hazard pictograms

Explosive (Symbol: exploding bomb)

Flammable (Symbol: flame)

Oxidising (Symbol: flame over circle)

Corrosive (Symbol: Corrosion)

Acute toxicity (Symbol: Skull and crossbones)

Hazardous to the environment (Symbol: Dead tree and fish)

Health hazard/Hazardous to the ozone layer (Symbol: Exclamation mark)

Serious health hazard (Symbol: health hazard)

Gas under pressure (Symbol: Gas cylinder)

For further guidance on chemical classification and symbols follow the below link:

http://www.hse.gov.uk/chemical-classification/classification/index.htm

Note: Pre-2015 Hazard Symbols may still be found on older containers. The old symbols for Highly Flammable, Harmful and Corrosive are shown below for information purposes only.