

The Lotus Academy Trust



Supporting children to find opportunities in every difficulty

The Damara School



Specialist SEMH Independent School

Control of Substances Hazardous to Health (COSHH) Policy

Approved by: Trust Board

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Review: Oct 20; Oct 21, Sep 22, Sep 23, Sep 24

Next review due by: September 2025

1. Policy Statement

This Policy has been produced in accordance with The Damara School's Health and Safety Policy to ensure that all health and safety issues relating to the Control of Substances Hazardous to Health (COSHH) are adequately managed and controlled.

The School is committed to protecting the health, safety, welfare and wellbeing of its employees and others who may be affected by the school's undertakings. It is essential therefore that everyone who works for or undertakes work on behalf of the school adheres to the requirements of this Policy.

It is the School's Control of Substances Hazardous to Health (COSHH) Policy to ensure that:

- a) the use of hazardous substances is avoided as far as is reasonable practicable.
- b) the risk to health arising from work activities involving hazardous substances is assessed.
- c) the exposure to hazardous substances is prevented or reduced by implementing adequate control measures.
- d) COSHH assessment and controls are monitored and adequately reviewed.
- e) employees are provided with appropriate information, instruction and training.
- f) all relevant statutory requirements and, where reasonably practicable, best practice guidance is adhered to.

2. Scope

The information, guidance and instruction within this Policy covers the use of hazardous substances. The Policy is applicable to all areas of the school; it is essential therefore that everyone involved in managing and controlling the use of Substances Hazardous to Health adheres to its requirements. The application of this Policy along with its supporting guidance will ensure that, so far as is reasonably practicable, the school meets all relevant statutory requirements regarding the general provision of the COSHH regulations.

The Policy and associated guidance provide a standardised approach for all persons who are responsible for work involving hazardous substances, ensuring consistency across the school.

3. Definitions

The following are key definitions for this policy:

Hazardous substance

A substance with the potential to cause harm if 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.

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

- 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)
- Biological agents (bacteria, viruses and other micro-organisms)
- Any kind of dust in a specific concentration
- Any other substances which may potentially create a risk to health, e.g. dusts, liquids, vapor's, gases, mist, fibers, solids or smoke.

These substances usually indicate their basic hazard group by having a warning symbol on the label. The current symbols are listed in Appendix 1.

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.

Material Safety Data Sheet (MSDS)

Health and safety information written in a standardised format and provided by the supplier or manufacturer of a substance. The MSDS will tell you if the substance is classified as a hazardous substance.

COSHH Risk Assessment

Is a careful examination of hazardous substances within the workplace and an evaluation of their potential to cause harm; taking into account the control measures/precautions that have been taken for their use.

Please note that this level of assessment is only required for those substances that are classified as hazardous to health.

Hazard

Is anything that has the potential to cause harm.

Risk

'Is the likelihood that harm will occur.' This is the chance, high, medium or low, that somebody could be harmed by these and other hazards, together with an indication of how severe the harm could be.

Likelihood

In respect to risk assessment, is the chance of a person being exposed to a hazard.

Severity

In respect to risk assessment, is the extent of personal harm that could result.

Workplace Exposure Limit (WEL)

The maximum concentration of the substance that a person may be exposed to in the workplace, for example the maximum concentration in workplace air, averaged over an 8 hour day.

COSHH Risk Assessment Register

This is our COSHH folder/ hardcopy of COSHH assessments and their inventory.

Competent nominated person

For the purpose of this Policy, this is an individual who is familiar with the task and substances being used.

Health surveillance

Health surveillance is any activity which involves obtaining information about employees' health and which helps protect employees from health risks at work. Health surveillance is undertaken by occupational health.

4. Roles & Responsibilities

The following specific roles and responsibilities apply to this Policy and are in addition to the general roles and responsibilities placed on the Headteacher, all line managers and employees within The Damara School's Health and Safety Policy.

4.1 The Head of School and line managers must ensure that:

- the use of hazardous substances is avoided. If this is not reasonably practicable then a COSHH assessment must be undertaken.

- safer alternative products are used, where reasonably practicable.
- hazardous substances that are being used, or produced as part of the work process or produced as waste are identified.
- a copy of the material safety data sheet (MSDS) is obtained for all products that are used.
- This must be a requirement of local purchasing procedures because MSDSs must be available for all hazardous products that are used/ stored.
- COSHH risk assessments for hazardous substances are undertaken and recorded (by completing Part 1 of the COSHH assessment form). The completion of the assessment can be delegated to a competent nominated person, however, the manager responsible for the activity must sign and agree to the assessment.
- a copy of the COSHH Assessment Part 1 is provided to the WCC COSHH Officer so that Part 2 can be completed.
- safe systems of work exist before starting work with hazardous substances. These safe systems of work must comply with all COSHH related legislation and this Policy.
- safe and adequate storage arrangements are provided for all products.
- substances are stored and labelled correctly in accordance with manufacturer instructions.
- Appropriate hazard signs should be provided on all storage areas/cupboards where a risk has been identified.
- correct disposal of substances e.g. hazardous waste, clinical waste, recycling of containers, using approved/licensed waste carriers.
- appropriate personal protective equipment (PPE) is purchased, issued and maintained, where necessary.
- all staff receive adequate & appropriate COSHH training, instruction and information, specific to their tasks.
- a COSHH risk assessment register exists and is reviewed and updated
- any localised extraction systems or engineering controls are regularly inspected, examined and maintained in compliance with statutory requirements.
- health surveillance (as identified through the COSHH risk assessment process) is undertaken where required. These records must be kept for 40 years.
- suitable arrangements are in place to deal with accidents and emergencies involving hazardous substances (e.g. spills).
- the COSHH assessment is circulated to all appropriate employees who are undertaking the activity so they are aware of the hazards/risks and controls/safe systems of work that must be followed. Notify other appropriate persons of actions to be taken.
- they recognise that Natural Rubber Latex is classed as hazardous to health, and must therefore follow the hierarchy of control below:

- Eliminate the risk where appropriate - gloves should only be worn where there is a risk of infection; or
- Substitute its use for another glove material where appropriate - nitrile, vinyl, synthetic; or
- Limit exposure – to do this you should follow the HSE's policy which states:
- "Single use, disposable natural rubber latex gloves may be used where a risk assessment has identified them as necessary. When they are used they must be low protein and powder-free."
- COSHH assessments are reviewed annually.
- COSHH assessments are retained for 5 years.
- Health and Safety Officer is notified immediately if an employee has been diagnosed with an occupational disease.
- waste disposal paperwork is held on file for three years for hazardous substances and be easily accessible.
- Report any occupational disease to the Health and Safety Executive (HSE).

4.2 Employees must:

- Familiarise themselves with the relevant COSHH risk assessments, activity risk assessments, procedures and safe systems of work.
- Use hazardous substances in accordance with the manufacturer's instructions and COSHH risk assessments (for non-hazardous substances following the instructions on the container).
- Attend and follow instruction and training in the use of/contact with substances.
- Immediately report any health symptoms arising from their work to their line manager, e.g. skin irritation, breathing problems.
- Use all control measures (i.e. ventilation, PPE) in accordance with the COSHH assessment, safe system of work, instruction and training that has been provided.
- Use/wear/store/maintain and clean PPE if provided, as required.
- Report any defects in PPE provided, to manager immediately.
- Assist in the compilation of risk assessments (where required).
- Make themselves available for any health or medical surveillance deemed necessary in relation to the substances.
- Ensure good standards of hygiene.
- Report any other health and safety concern to the Head of School immediately.

4.3 The COSHH Officer will:

- Complete Part 2 of the COSHH Assessment for hazardous substances used for school activities.

- Carry out COSHH audits at the school on a scheduled basis.

5. Organization & Arrangements

5.1 Identification and use of hazardous substances

The Head of School must identify whether a hazardous substance is being used/generated as part of the process/or produced as waste. The MSDS will inform whether it is a hazardous substance.

Before work commences, the person with overall control for the activity must first avoid the use of hazardous substances. If this is not reasonably practicable then they must agree to the use of any hazardous substance involved in the task and ensure a COSHH assessment is completed.

They must ensure that a MSDS has been obtained and COSHH Risk Assessment has been completed.

5.2 Risk assessment

5.2.1 COSHH Risk assessment

For every substance the School uses we must have the Material Safety Data Sheet (MSDS) for it.

If the substance is 'hazardous', then a COSHH risk assessment is required. The MSDS informs staff about whether or not the substance is hazardous, and therefore whether it requires a COSHH assessment. The MSDS will give information about substance hazards; it is not a replacement for the risk assessment.

Part 1 must be completed by the Head of School (or competent nominated person) part 2 will be completed by the COSHH officer

If the Head of School is advised that staff are pregnant or have a medical condition whereby they may be affected by hazardous substances, advice on using substances must be sought and included in the risk assessment as the mother or unborn child may be at risk.

5.2.2 Control measures

An important part of the process of 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, they need to be improved. When identifying control measures you must follow the hierarchy of control as stated below:

- Elimination - Eliminate the use of a harmful substance.
- Substitution - Use a safer form of the product, e.g. paste rather than powder.
- Reduction - reduce the amount used or the time spent using the substance
- Isolation/enclosure
- Local Exhaust Ventilation (LEV)/General ventilation i.e. doors/windows

- Safe systems of work
- Information, instruction, training
- Supervision
- Personal protective equipment (PPE)

Control measures must take into account the action required in the event of an emergency.

5.2.3 Competence

The COSHH risk assessment must be undertaken by the Head of School or competent nominated person together with someone who is familiar with the systems of work within the area being assessed.

5.2.4 COSHH risk assessment form

The form attached as Appendix 3 is the COSHH risk assessment form.

5.2.5 Communication, information, instruction & training

COSHH assessments must be made available and brought to the attention of all relevant employees. Copies of the assessment must be displayed next to or be held with the products so that in the event of an incident, the correct emergency action or first aid measures can be taken.

Inform employees about the hazards/risks associated with the use of that substance. In addition to this, employers must be made aware of the control measures that have been identified via the risk assessment and that they must be complied with. Give employees the necessary instruction and training to enable them to follow/implement the required controls.

5.2.6 COSHH Assessment record and review

All COSHH assessments must be recorded. For this you must use the COSHH Assessment form (see Appendix 3).

COSHH risk assessments must be reviewed:

- at least annually to ensure that they are still valid and up-to-date;
- 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 MSDS received
- upon HSE direction; and following any adverse incident involving the substance or task. COSHH Risk Assessments must be kept for five years and must be available for inspection as part of annual inspections and audits.

If COSHH risk assessments are used as material evidence in a personal injury adverse event then a copy of the risk assessment should be placed with the employee's medical records for future reference.

If a COSHH assessment identifies that health surveillance is required, then it will be undertaken by Occupational Health. These health records are to be kept for 40 years.

6. Monitoring & Review

The content of this Policy and its effectiveness will be the subject of a three-yearly review in conformity with the school's Health & Safety Policy. In addition, this Policy will be the subject of review and amendment within this period should significant changes occur. The policy will be reviewed in line with changes yearly. This policy is subjected to quality control procedures and hence previous issues of the document will be archived.

7. Further Reference & Associated Documents

- Risk Assessment Policy
- Asbestos Report
- Health and Safety Policy and Guidance

Appendix 1: Hazard symbols and their meaning

The following is a basic summary of what symbols mean.

There are nine primary hazard symbols relating to COSHH and this section will explain the COSHH signs.



While some of these signs and symbols are self-explanatory or have obvious meanings, others deserve more explanation:

- **Dangerous to the environment** - Chemicals that may present an immediate or delayed danger to aspects of the environment – wildlife, plant life, people, weather systems.
- **Toxic** - Chemicals that at low levels cause damage to health. When the sign includes a T+ in the top left-hand corner, it means chemicals that can cause damage to health at very low levels.
- **Oxidising** - Chemicals and preparations that react exothermically with other chemicals – often resulting in combustion. Common oxidizing agents are oxygen, hydrogen peroxide and the halogens.
- **Corrosive** - Substances that can damage or destroy other substances with which it comes into contact by means of a chemical reaction. These can exist as any state of matter, including liquids, solids, gases, mists and vapours.
- **Longer-term health hazards** - This sign indicates the presence of a cancer-causing (carcinogenic) agent or substance with respiratory, reproductive or organ toxicity that causes damage over time (a chronic, or long-term, health hazard).
- **Caution** - Caution relates to slightly less hazardous substances that may not pose an immediate or severe threat to health but should be handled carefully within the workplace.