

The Ellesmere Port C of E College



Control of Substances Hazardous to Health (COSHH)

Policy Information:

Date prepared	September 2023
Adopted by Governors	September 2023
Implementation Date	Immediate
Frequency of Review	Annually
Review Date	September 2024

Approved by Principal:

Cath Green

Approved by Chair of Governors:

Gordon McGuinness



Frank Field
Education Trust

Contents

Policy Statement.....	4
Scope	4
Definitions.....	4
Hazardous Substances	4
Material Safety Data Sheets (MSDS).....	5
COSHH Risk Assessment	5
Workplace Exposure Limits (WEL).....	5
COSHH Risk Assessment Register	5
Competent Nominated Person	5
Personal Protective Equipment (PPE).....	5
Health Surveillance	6
Roles and Responsibilities	6
The Board and Chief Executive Officer (CEO).....	6
Principals / Head Teachers	6
Heads of Departments	6
All Staff.....	7
Site Officer / Caretaker / Manager	7
Organisation and Arrangements	8
Identification and Use of Hazardous Substances	8
COSHH Risk Assessment	8
Control Measures	9
Competence.....	9
Communication, Information, Instruction and Training.....	9
COSHH Assessment Record and Review	9
Monitoring and Review.....	10
Further Reference.....	10
Appendix 1 - COSHH Symbols	11
Declaration by: Employee (20).....	12
Declaration by: Line Manager/Supervisor ²⁰¹	12
Guidance notes for COSHH assessment form	13
Methods of prevention or control of exposure	13

Policy Statement

- 1.1 This policy has been produced in line with the Health and Safety Policy to ensure that all health and safety issues relating to the Control of Substances Hazardous to Health (COSHH) Regulations 2002 are appropriately managed and controlled.
- 1.2 FFET is committed to protecting the health, safety, welfare and well-being of all its employees and others who may be affected by FFET's undertakings. It is essential therefore that everyone who works for or undertakes work on behalf of the Trust/School adheres to the requirements of the policy.
- 1.3 The objectives of FFET's Control of Substances Hazardous to Health (COSHH) policy are to ensure that:
- a. The use of hazardous substances is avoided as far as is reasonably practicable;
 - b. The risks to health arising from work activities involving hazardous substance is assessed;
 - c. The exposure to hazardous substances is prevented or reduced by implementing adequate control measures;
 - d. COSHH assessment and controls are monitored, adequately reviewed and recorded where required;
 - 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.

Scope

- 2.1 The information, guidance and instruction within the policy cover the use of hazardous substances. The Policy is applicable to all areas of the Trust and its Academies, except Science Departments, where they are expected to use a department specific COSHH assessment appropriate to their teaching and learning environment. It is essential, therefore, that everyone involved in managing and controlling the use of Substances Hazardous to Health adheres to its requirements.
- 2.2 The application of this Policy along with its supporting guidance will ensure that, so far as is reasonably practicable, Academies meet all relevant and appropriate statutory requirements regarding the general provision of COSHH Regulations 2002.
- 2.3 The Policy provides a standardised approach for all persons who are responsible for work involving hazardous substances, ensuring consistency across the Trust.

Definitions

Hazardous Substances

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, chemicals used in a process are examples.

Hazardous substances occur in the following forms from packaged items, work processes or waste:

- substances, or a mixture of substances, classified as dangerous which carry warnings such as 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, Vapours, Gases, Mists, Fibres, Solids or Smoke.

These substances usually indicate their basic hazard group by having a warning symbol on the label.

The new symbols introduced from 2015 are listed in Appendix 1.

Some substances are excluded from the COSHH Regulations 2002 but are covered by their own specific regulations. These include: Radioactive Materials, Asbestos, Lead and Lead Products.

Material Safety Data Sheets (MSDS)

A material Safety Data Sheet (MSDS) contains Health and Safety information written in a format covering standard information e.g. handling and storage, disposal considerations, etc., 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

A COSHH Risk Assessment is a careful examination of hazardous substances within the workplace and evaluation of their potential to cause harm, taking into account the control measures/precautions that have been taken for their use.

This level of assessment is only required for those substances that are classified as hazardous.

- i. Hazard is anything that has the potential to cause harm.
- ii. Risk is the likelihood that harm will occur.
- iii. Likelihood is the chance of a person being exposed to a hazard.
- iv. Severity is the extent of personal harm that could result.

Workplace Exposure Limits (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 the FFET register of COSHH Assessments. A full FFET/School register will be located within the Academy Site Officer/Caretaker/Manager office with appropriate sub lists at the front of all COSHH folders pertaining to the chemicals in that folder. Both electronic and hard copy are acceptable.

Competent Nominated Person

For the purpose of this policy, this is the individual who is familiar with the tasks and the substances being used within a particular Academy. The Site Officer/Caretaker/Manager will in most occasions be the nominated person.

Personal Protective Equipment (PPE)

Personal Protective Equipment is the equipment which must be worn when handling chemicals and may include safety eyewear, safety gloves, aprons etc.

Academies will provide appropriate PPE.

Health Surveillance

Health Surveillance is and should be used, where through the use of a chemical substance there may be potential detrimental effects on an individual in the workplace. Health Surveillance would be undertaken by the Occupational Health Service provider to the Trust as advised by Human Resources.

Roles and Responsibilities

The following specific roles and responsibilities apply to this policy and are in addition to the general roles and responsibilities placed on Academy Principals', all line managers and employees within the FFET Health and Safety Policy.

The Board and Chief Executive Officer (CEO)

Within the scope of this policy, the Board and CEO have overall responsibility for:

- ensuring that all substances in use across the Trust are effectively and safely managed;
- allocating sufficient resources to ensure that the Trust meets all legislative requirements for COSHH;
- evaluation of risk; authorising the most appropriate means of risk control;
- the provision of a safe and healthy workplace for employees and visitors to all Academies within the Trust irrespective of their role;
- the provision of adequate welfare facilities enabling health monitoring if appropriate;
- proactively encouraging safe behaviours in both staff and pupils/students; and
- ensuring timely, at least annual, review of this policy document; delegated to the Trust Facilities Manager.

Principals / Head Teachers

Within the scope of this policy, the Principal/Head Teacher has overall responsibility for:

- providing a recognised structure within which COSHH regulations 2002 are managed;
- supporting and encouraging staff to manage hazardous substances safely;
- providing adequate resources to ensure compliance with legislative requirements;
- ensuring that safe working practices are used and reviewed to minimise risk; implementing new or changed practices where appropriate;
- providing suitable risk assessment training for all staff;
- ensuring correct disposal of hazardous substances;
- ensuring staff have access to health monitoring services;
- encouraging staff to be proactive in protecting members of, and visitors to their Academy from the effects of hazardous substances; and
- following Trust procedures for any member of staff who persistently fails to follow agreed procedure and legislative requirements.

Heads of Departments

Within the scope of this policy, Head of Departments are responsible for:

- maintaining a COSHH Register of substances used within their department;
- introducing new substances only after receipt of a Material Safety Data Sheet, a full Risk Assessment, a safe working procedure and staff training;
- ensuring that all members of their department comply with current health and safety legislation;
- providing approved storage facilities for hazardous substances specific to their departments;

- ensuring that all substances are properly labelled;
- implementing, monitoring and reviewing procedures designed to minimise risk from hazardous substances within their departments;
- inspecting departmental storage areas regularly to ensure that the only substances available are those in regular use;
- disposing of substances not in regular use and in an appropriately safe manner in conjunction with the Academy Site Staff or The Trust if significantly hazardous;
- implementing and following whole school health and safety procedures; reporting when these procedures are inadequate;
- instructing their staff and pupils/students in safe working procedures;
- following Trust procedures for any member of staff who persistently fails to follow the agreed procedures and any legislative requirements;
- taking all reasonable and practical steps to prevent unauthorised or improper use of substances;
- reporting instances of ill health amongst their staff or pupils/students that may be attributable to substances in use in their department;
- ensuring that adequate Personal Protective Equipment (PPE) is provided and fit for purpose where other control measures cannot be used appropriate for the substances in use within their department; storing and inspecting the PPE before and after use;
- providing a copy of Risk Assessments to be retained within the department and a copy to the Site Officer/Caretaker/Manager;
- auditing substances and their storage to ensure compliance with legislation; and
- having awareness of dangerous substance symbols and abbreviations and of risk and safety phrases (reference EH40).

All Staff

Within the scope of this policy, all members of staff are responsible for:

- familiarising themselves with the substances within the department, the COSHH register and safe working practices;
- ensuring that all health and safety regulations and safe working practices for handling substances are followed by both staff and pupils/students;
- only using new substances after the Risk Assessment and safe working procedures have been agreed;
- ensuring that substances are properly labelled;
- informing the Head of Department when substances are no longer needed and require disposal;
- instructing pupils/students in safe working procedures for handling substances; disciplining pupils/students who persistently fail to follow those procedures;
- ensuring that their Personal Protective Equipment is used correctly and appropriately;
- ensuring that pupils/students do not misuse or abuse PPE provided for their protection;
- taking reasonable care for their own health and safety and for that of any other persons who may be affected by their acts or omissions at work; avoiding conduct that would put themselves or others at risk;
- co-operating with their employer and their delegated representatives to enable full compliance with current health and safety legislation;
- reporting any symptoms of ill health that may be attributable to substances in their work environment to their line manager;
- reporting unsafe conditions, damaged or defective plant, equipment or other facility to the Site Officer/Caretaker/Manager.

Site Officer / Caretaker / Manager

Within the scope of this policy, the Site Officer/Caretaker/Manager is responsible for:

- obtaining MSDS, reviewing the information, compiling the COSHH Risk Assessments and

providing these to appropriate Academy personnel including cleaning staff where appropriate;

- providing Trust/Principal with an electronic version of all COSHH Risk Assessments;
- maintaining the Central COSHH Register of their Academy for inspection by the relevant authorities in conjunction with the Heads of Departments;
- arranging appropriate storage facilities for substances if required;
- ensuring correct disposal of all substances; this will include daily waste as well as 'specialist' items;
- ensuring that all members of the Trust and contractors visiting their Academy comply with COSHH regulations 2002;
- implementing such technical and physical control measures as directed by the Principal;
- acting as liaison and focal point for annual LEV inspections; implementing remedial works as highlighted;
- highlighting disposal issues for articles which may contain hazardous substances such as refrigerators;
- seeking assistance for problems that arise with substances NOT part of the COSHH Regulations 2002 e.g. Asbestos and Lead
- seeking assistance from specialist authorities when it is suspected that workplace exposure limits (WEL's) may be exceeded.

Organisation and Arrangements

Identification and Use of Hazardous Substances

The Academy's Principal's and Line Manager must identify whether a hazardous substance is being used/generated as part of the process/or produced as waste. The Material Safety Data Sheet (MSDS) will inform whether it is a hazardous substance.

Before work commences, the person with overall control for the activity must first avoid 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.

COSHH Risk Assessment

For every substance Academies within the Trust use, there must be a MSDS in place.

If the substance is 'hazardous' then a COSHH risk assessment is required.

The MSDS informs managers 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.

The COSHH assessment combines the assessor's own knowledge and methods of use of the substance in their areas of work and responsibility including hazardous products, by-products or waste.

If Human Resources is advised that a member of staff is pregnant or has 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, or member of staff with a medical condition, may be at risk.

See Appendix 2 for risk assessment form

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 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 must 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 of a safer alternate 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 and training;
- supervision;
- Personal Protective Equipment (PPE);

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

An appropriate Flow Chart will be added to the Academy specific COSHH folder.

Competence

The COSHH risk assessment must be undertaken by a Line Manager or competent nominated person, together with someone who is familiar with the work being assessed.

Communication, Information, Instruction and 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 held with the products so that in the event of an incident, the correct emergency action or first aid measures can be taken.

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

COSHH Assessment Record and Review

All COSHH assessments must be recorded. For this you must use the COSHH Assessment Form. (See Appendix 2).

COSHH Risk Assessments must be reviewed:

- at least annually to ensure they remain valid and up to date;
- when there has been a change in work procedures;
- if the 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 5 years and must be available for inspection as part of annual inspections and audits. MSDS data sheets are to be renewed on a 5 yearly basis.

If the 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 personnel file for future reference.

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

The COSHH risk assessment must be undertaken by a Line Manager or competent nominated person, together with someone who is familiar with the work being assessed.

Monitoring and Review

To ensure the effective application of this policy, departments are required to have in place arrangements for monitoring and reviewing its implementation at regular intervals. The Policy review needs to promote a cycle of continuous improvement; therefore any actions identified to ensure this, should be considered and implemented where reasonably practicable.

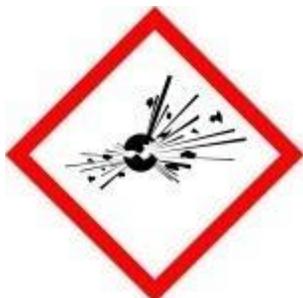
The content of this Policy and its effectiveness will be reviewed on a 3 yearly review. In addition, this Policy will be subject of review and amendment within this period should significant changes occur

Further Reference

- Frank Field Education Trust Health and Safety Policy.
- GHS. www.hse.gov.uk/chemical-classification/legal/clp-regulation.htm
- HSE. www.hse.gov.uk/coshh/basics.htm
- HSE. www.hse.gov.uk/coshh/detail/coshh-clp-reach.htm
- HSE. Control of Substances Hazardous to Health 2002 (as amended), Approved Code of Practice, L5
- HSE. Working with Substances Hazardous to Health; 'What you need to know about COSHH' (INDG 136. Rev 4).

Appendix 1 - COSHH Symbols

Explosives



Flammable



Oxidising



Gases under pressure



Corrosive



Toxic



Caution



Long term health hazards



Environmental Hazard



COSHH Assessment Form

This assessment only addresses the risk of harm to health from the substances listed. Additional risk assessments may be required to control the risk from other hazards associated with this work/the procedures used.		
Assessor (print) ⁽¹⁾	Line Manager/Supervisor ⁽²⁾	
Assessment Date ⁽³⁾	Dates reviewed ⁽⁴⁾	
HAZARDS IDENTIFIED *If the substance has a H350 or H350i hazard statement, it must also be registered on your personal carcinogen return (at Occupational Health) <i>where exposure is not adequately controlled.</i>		
Substance ⁽⁵⁾ <i>(Name of Chemical, etc. as appropriate); NB.</i>	Hazardous Properties ⁽⁶⁾ <i>(Provide details of how the substance could cause harm, e.g. harmful by inhalation, skin contact, flammable, carcinogen, allergen, etc)</i>	Quantity ⁽⁷⁾ <i>(Indicate how much of the substance will be used)</i>
Additional information ⁽⁸⁾ <ul style="list-style-type: none"> Workplace Exposure Limits: H and P statements: 		
Emergency Procedures ⁽⁹⁾ <ul style="list-style-type: none"> Eye contact: Inhalation: Skin contact Ingestion: Spill procedure: 		
What will the chemical be used for? <i>(insert title of experiment or experimental procedure)</i> Who may be exposed? ⁽¹⁰⁾		

METHODS OF PREVENTION OR CONTROL OF EXPOSURE

(select all that apply by circling/ticking/highlighting the appropriate statement)

1. Engineering controls required ⁽¹¹⁾ <ul style="list-style-type: none"> total containment fume cupboard local exhaust ventilation blast screen 	2. Access control ⁽¹²⁾ <ul style="list-style-type: none"> restricted to competent personnel special containment facility (give specific area):
3. Special procedures ⁽¹³⁾ <ul style="list-style-type: none"> Standard Operating Procedure (SOP) required <input type="checkbox"/> Code of practice, local rules, etc <input type="checkbox"/> 	4. Approved PPE ⁽¹⁴⁾ <i>(Note: PPE is to be used as the 'last resort' when controlling exposure)</i> <ul style="list-style-type: none"> gloves etc (specify type) eye protection (specify type) laboratory coat/overalls (specify type)

	<ul style="list-style-type: none"> • other PPE (specify)
Disposal Procedures⁽¹⁵⁾ <i>(Give details of waste disposal procedure to be used)</i> <ul style="list-style-type: none"> • Are chemicals with 'P' (Precautionary) Statements and 'H' (Hazard) Statements (environmental hazards) involved? Yes / No 	
TRAINING REQUIREMENTS⁽¹⁶⁾ (List any specialised training requirements before work can begin)	
HANDLING AND STORAGE REQUIREMENTS⁽¹⁷⁾ (Note any special requirements e.g. ventilation, chemical incompatibility, flash point, etc)	

ASSESSMENT OF RISK USING CONTROLS DETAILED ABOVE⁽¹⁸⁾
(Are the hazards/risks suitably controlled, using the control measures detailed above? If not, state the further actions required, e.g. Requirement for a standard operating procedure (SOP), etc).

Authorisation by: Line Manager¹⁹

I confirm that I have considered and understand the chemical to be used and the associated hazards. I am satisfied that all of the hazards have been identified and that the control measures to be followed will reduce the risks to as low a level as reasonably practicable.

Print name: _____ Signed: _____

Date: _____

Declaration by: Employee⁽²⁰⁾
 I confirm that I have read this COSHH Assessment and that I understand the hazards and risks involved and will follow all of the safety procedures stated.

Signed:
 Name (Print):
 Date:

Declaration by: Line Manager/Supervisor²⁰¹
 I confirm that the employee who has signed above is competent to undertake the work. My counter-signature indicates that I am happy for the work to proceed.

Signed:
 Name
 (Print):
 Date:

Guidance notes for COSHH assessment form

This form must be completed for every hazardous chemical used within the Trust and its Academies. The form must be signed by the employee and their Line Manager/Supervisor **prior** to the commencement of any workplace activity.

- (1) **Assessor:** Insert the name of the person doing this assessment
- (2) **Line Manager/Supervisor** Insert the name of the **Line Manager/Supervisor**.
- (3) **Assessment Date:** Insert the date that the assessment form is completed. The assessment is valid for a maximum of 1 year. It must be reviewed after 1 year, or if a significant change occurs (change of lab, pregnancy, etc).
- (4) **Dates reviewed:** all COSHH assessments must be reviewed annually (as a minimum). The review date should be entered here, and signed by the assessor to confirm that the assessment is still valid.
- (5) **Substance:** insert name of the chemical to be used. NB. Biological hazards must not be assessed on this COSHH form.
- (6) **Hazardous properties:** insert details of all of the hazardous properties of the chemical – egg. Flammable, explosive, carcinogen, harmful by inhalation, etc).
- (7) **Quantity:** insert quantity to be used (mg, g, ml, etc)
- (8) **Additional information:** Include details of any additional information, including any workplace exposure limits. Detail fully all H and P statements (it is not sufficient to simply stat H300, full details are needed).
- (9) **Emergency procedures:** provide full details of emergency procedures to be employed following contact with the chemical (skin contact, eye contact, inhalation and ingestion) – such as use of diphotetine, administration of emergency oxygen, etc. Also include details of emergency spill procedures.
- (10) **What will the chemical be used for? Who may be exposed? :** Insert title of experiment or experimental procedure that the chemical is to be used in, and detail who may be exposed (individual worker? People in close proximity? Cleaners? Engineers?).

Methods of prevention or control of exposure

Sections 11-14 detail the methods for preventing or controlling exposure to the chemical. The COSHH hierarchy of control measures should be used when determining the methods to be used to prevent/control exposure, with engineering and group control measures being employed in preference to individual measures (such as individual PPE).

- (11) **Engineering controls** required: identify the control measures necessary to prevent/control exposure, such as use of a fume cupboard, LEV or blast screen, by circling/ticking/highlighting the appropriate statement(s).
- (12) **Access control:** In order to prevent/control exposure, is it necessary to restrict access to competent personnel? Are special containment facilities required? Please circle/tick/highlight the appropriate statement(s).
- (13) **Special procedures:** please identify any special procedures necessary to prevent/control exposure. This might include the need for an SOP to be developed, or for local rules to be drawn up. Please circle/tick/highlight the appropriate statement(s).

- (14) **Approved PPE:** PPE is to be used as the 'last resort' when preventing/ controlling exposure. Please detail the PPE to be used when handling the chemical. Please circle/tick/highlight the appropriate statement(s) and include details of the type of gloves, etc to be used.
- (15) **Disposal procedures:** Identify whether the chemical is an environmental hazard; Detail fully how the chemical waste is to be disposed of (down sink, by specialist contractor, etc)
- (16) **Training requirements:** detail any specialised training requirements that must be met before the work can begin – e.g. Attendance on a gas safety course, etc).
- (17) **Handling and storage requirements:** Note any special requirements e.g. ventilation, chemical incompatibility, flash point, etc.
- (18) **Assessment of risk using controls detailed above:** Are the hazards/risks suitably controlled, using the control measures detailed above? Provide details; If not controlled, state the further actions required, e.g. Requirement for a standard operating procedure (SOP), etc.
- (19) **Authorisation by Line Manager/Supervisor:** the employer/supervisor must sign and date the assessment, to confirm that they have considered and understand the chemical to be used and the associated hazards, and that they are satisfied that all of the hazards have been identified and that the control measures to be followed will reduce the risks to as low a level as reasonably practicable.
- (20) **Declaration by Employee:** the employee must sign and date the assessment to confirm that they have read the COSHH Assessment, understand the hazards and risks involved and will follow all of the safety procedures stated.
- (21) **Declaration by Line Manager/Supervisor:** the employer/supervisor must sign and date the assessment, to confirm that the researcher is competent to undertake the work.