



POLICY AND PROCEDURE FOR THE CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (CoSHH)

**Approved by Resource Committee on: 19.06.2023
Review Date: June 2026**

1) BACKGROUND

This policy is designed to comply with the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 1999 (CoSHH).

2) POLICY

This policy applies to all staff working on the premises, and to all agency and supply staff, contractors, volunteers and work placement students.

The aim of this policy is to ensure that we provide adequate training, instruction and information to prevent staff and others coming into contact with hazardous substances. This will be achieved by providing safety equipment and by having a prescribed procedure to safeguard the health, safety and welfare of all staff, pupils and visitors.

This policy applies to all hazardous substances (including biological hazards).

The school recognises the need to provide a safe and secure working environment. Caring for all personnel and minimizing risk is inseparable from all other school objectives. To achieve this, the school accepts that the policy for the Control of Substances Hazardous to Health (CoSHH) requires a high level of management commitment, professional competence and adequate resources.

3) RESPONSIBILITIES

i) Governing Body

The Governing Body recognises its responsibilities to implement, in full, its duties in respect of the Control of Substances Hazardous to Health Regulations 1999 (CoSHH).

ii) Head Teacher

The Governing Body delegates to the Headteacher, responsibility for the implementation of this policy and procedures. The Headteacher is responsible for ensuring that there are sufficient numbers of trained competent staff, and, so far as is reasonably practicable, that staff follow safe systems of work.

The day to day implementation and monitoring of this policy and procedures is delegated to the Caretakers (CoSHH Co-ordinators), who have both been CoSHH trained. The Business Manager will be responsible for conducting an annual CoSHH audit.

iii) Caretakers

A range of duties towards employees exist under the CoSHH Regulations 1999. These duties also apply to other persons, so far as it is reasonably practicable, who may be affected by the work. The main duties are listed below.

- To carry out (and review) a formal assessment of health risks to employees.
- To prevent/control exposure (and monitor any exposure) of employees to health risks.
- To institute proper use of controls and Personal Protective Equipment (PPE).
- To ensure that controls are appropriate and tested and keep records as necessary.

- To ensure that appropriate health surveillance for employees is provided, where necessary.
- To provide information, instruction and training, as appropriate/necessary, regarding all hazardous substances.

4) TRAINING REQUIREMENTS

Staff who may be exposed to hazardous substances will:

- Be provided with suitable and sufficient information, instruction and training so that they are aware of the risks to their health created by such exposure and the precautions which should be taken to minimize the risks.
- Receive training to a safe level in the handling of hazardous substances, procedures, the use of control measures and in emergency procedures. Staff training must include accident and defect reporting procedures. Staff issued with PPE should be trained in its use, limitations, storage, cleaning and maintenance.

5) PROCEDURE

The CoSHH Regulations require employers to undertake a number of evaluation and control measures. These evaluations must be recorded, together with the precautions taken to control or prevent exposure of employees and others to the substance(s). This procedure is carried out by our CoSHH coordinators.

There are seven key elements of CoSHH:

- Assessment
- Control Measures
- Maintenance of Control Measures
- Monitoring of Exposure
- Health Surveillance
- Provision of Information
- Record Keeping

A significant undertaking is required to determine and record the following:

- What substances are present?
- What activities use, store or transport such substances?
- What hazards are associated with these substances?

6) THE ASSESSMENT

The Business Manager in liaison with the Caretakers will ensure that no work is carried out that is liable to expose employees, or others to substances hazardous to health, unless a suitable and sufficient assessment, in writing, of those risks has been carried out.

- Before carrying out any full risk assessments the Caretakers will compile an initial inventory of substances kept in school, and will identify the level of hazard. This initial inventory will be kept updated as new substances are brought onto the premises.
- When it has been identified that a substance is classified as hazardous, the Caretakers will obtain Safety Data Sheets and then complete a full CoSHH risk assessment. The full risk assessment will be stored together with any relevant/available Safety Data Sheets, in the school's Health and Safety file under the CoSHH heading.
- All persons in the area to be assessed should be included. All persons affected by the work, including pupils, visitors and staff, should be considered.
- The Caretakers will ensure that the risk assessments are made available to all members of staff likely to be affected by the substance including cleaners. This is normally done by giving a copy to the relevant member of staff and by notifying all staff that a copy is in the health and safety file which is kept in the general office. These documents are also referred to as part of the induction programme for all new staff.

- CoSHH risk assessments will be carried out for exposures to biological agents i.e blood, vomit and human faeces.
- Anything that is done to eliminate or reduce exposure is known as a control measure. When the Caretakers are considering their preliminary assessment, their first consideration in control is to eliminate the hazardous substance if reasonably practicable. If this cannot be done, then substitution with a less hazardous alternative or the substance in a less hazardous form may reduce the risk potential. So far as is reasonably practicable, control should be provided by measures other than the provision of personal protective equipment. Only where measures taken to prevent, or control exposure, do not prevent, or provide adequate control, should personal protective equipment be considered. Once it is established by the CoSHH coordinators that the substance in question is the best alternative (so far as is reasonably practicable) they will complete the necessary CoSHH risk assessment.
- The assessment must be reviewed if there is reason to suspect that it is no longer valid, or there has been a significant change in the matters to which the assessment relates, and in any case at least every five years. Where a review indicates changes in the assessment are required, these changes must be made.

7) CONTROL OF ALL NEW SUBSTANCES

Before any substance is brought into the workplace, the Caretakers will check whether it is classified as hazardous. In each case, where the substance is recognised as hazardous, Safety Data Sheet/s (SDS) will be obtained from the supplier in order to gain information on how to manage the substance. The SDS give details of the health effects of exposure. The Caretakers will then complete a full CoSHH risk assessment and store this, together with the Safety Data Sheets, in the school' health and safety file under the CoSHH heading. Staff using the substance will be fully informed of the precautions and control measures they need to take.

8) PREVENTION OR CONTROL OF EXPOSURE TO SUBSTANCES HAZARDOUS TO HEALTH

The Business Manager, in liaison with the Caretakers, will ensure that:

- Exposure of employees to substances hazardous to health is prevented or where it is not reasonably practicable to do so, then it is adequately controlled.
- Checks are made to see whether, by varying the work routine, the substance used, or by using the substance in a less hazardous form, the risk level can be reduced.
- So far as is reasonably practicable control is provided by measures other than the provision of personal protective equipment.
- Where measures taken to prevent or control exposure, do not prevent, or provide adequate control, employees will be provided with suitable personal protective equipment.
- Employees are aware that they have a duty to make full and proper use of any control measures provided/in place, and that they must report any defects, or necessary changes, immediately to a senior member of staff.
- There is a system for removing hazardous substances deemed to be out of date or no longer required, from the site in a safe and legal manner.
- Emergency procedures including procedures for dealing with spillages are in place.

9) MONITORING OF EMPLOYEES' HEALTH

The Business Manager, in liaison with the Caretakers, will ensure that the exposure of employees to hazardous substances will be suitably monitored as required under the CoSHH Regulations.

10) AUDIT

At least once per year, an audit will be carried out by the Business Manager. Their remit will be to check the following:

- All hazardous substances being used, stored or transported in school are included on the CoSHH register and have been assessed.
- The CoSHH register does not contain substances that are no longer to be used, stored or transported in school.
- All hazardous substances are under the day to day supervision of suitably trained staff.
- The storage of the hazardous substance is safe and meets any legal requirements.
- The quantity of hazardous substances held is minimized, in order that proper procedural duties can be effected.
- That staff training and training records are being updated, and that so far as can be ascertained, staff are using the hazardous substances properly so that the risks are minimized.
- Emergency procedures are in place and functional eg spillage kits, PPE etc.
- Health surveillance is being carried out where necessary and records of exposure to hazardous substances are kept up to date where applicable.

COSHH FLOWCHART

