



# **COSHH Policy**

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## Statement of intent

**Mayfield School** understands the importance of protecting the health and safety of all its employees and pupils.

The Control of Substances Hazardous to Health Regulations (COSHH) 2002 (amended 2004), 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 the use of risk assessments and appropriate control measures.

In accordance with the regulations, the school has created this policy to 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.

The main aims of this policy are:

- To avoid the use of hazardous substances as far as is reasonably practicable.
- To assess the risk of hazardous substances used in the school and the impact they may have on health.
- To implement appropriate control measures in order to manage identified risks.
- To regularly monitor control measures and ensure that they are adequate, including the review of control equipment.
- To regularly monitor the extent to which staff and pupils are exposed to hazardous substances and conduct health surveillance where necessary.
- To provide training for members of staff on the hazards, risks and precautions needed for effective control.

This policy is applicable to all full-time, part-time and supply staff, pupils, contractors, volunteers and work placement students.

Signed by:

\_\_\_\_\_ **Headteacher**                      Date: \_\_\_\_\_

\_\_\_\_\_ **Chair of governors**                      Date: \_\_\_\_\_

## 1. Scope

The information, guidance and instruction within the Policy cover the use of hazardous substances. The Policy is applicable to all areas of Mayfield School. The Science Department and Maintenance Team (HR) will have departmental specific COSHH assessments; 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 provides a standardised approach for all persons who are responsible for work involving hazardous substances, ensuring consistency across the school.

## 2. Definitions

### **Hazardous Substances:**

A substance with the potential to cause harm if inhaled, ingested, injected or absorbed through the skin or released in to 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 warning 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, vapours, gases, mists, fibres, solids, or smoke

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

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 in to account the control measures/precautions that have been taken for their use.

Please note: 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** is the extent of personal harm that could result.

**Severity** 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, or for example the maximum concentration in workplace air, averaged over an 8 hour day.

### **COSHH Risk Assessment Register**

This is your 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 employee's health and which helps protect employees from health risks at work. Health surveillance would be undertaken by the Occupation Health Service for Mayfield School as advised through Human Resources.

## **3. 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 the Headteacher, all Line Managers and employees within Mayfield's School's Health and Safety Policy.

### **3.1 Headteacher responsibilities (with the support of the Senior Leadership Team):**

- Oversee the day-to-day implementation of this policy and ensure that all members of staff are fully aware of their roles and responsibilities, as well as the necessary control measures they are required to undertake.
- Ensure that all members of staff receive adequate and appropriate COSHH training, instruction and information, specific to their tasks.
- Ensures that, where possible, the use of hazardous substances is avoided.
- Ensure that risk assessments are completed, where the use of hazardous substances cannot be avoided and effective control measures are in place.
- Safer alternative products are used, where reasonably practicable.
- Ensure that an up-to-date record is maintained of all hazardous substances which are used, and they are clearly labelled and stored appropriately.
- A copy of the material safety data sheet (MSDS) is obtained for all products where possible that are used. This must be a requirement of local purchasing procedure because MSDSs must be available for all hazardous products that are used/stored.
- COSHH risk assessments for hazardous substances are undertaken and recorded.
- 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.
- 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 accident and emergencies involving hazardous substances (e.g. spills).
- COSHH assessments are 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.
- COSHH assessments are reviewed on a regular basis.
- COSHH assessments are retained for 5 years.
- Take all reasonable and practical steps to prevent unauthorised or improper use of substances.
- Report instance of ill health amongst staff or pupils that may be attributable to substances in use in the school.

### **3.2 School Business Manager Responsibilities (with the support of the finance team)**

- Obtain MSDS for all new products purchased
- Maintain a central COSHH register for inspection by the relevant authorities
- Notify the Headteacher of any new substances that require a COSHH assessment before use and ensure that the assessment is carried out.
- Where a substance is deemed hazardous, source a suitable alternative if possible to do so.

### **3.3 Responsibilities of all members of staff**

- All members of staff are responsible for familiarising themselves with this policy.
- Be familiar with the relevant COSHH risk assessments, activity risk assessments, procedures and safe systems of work.
- All members of staff use hazardous substances in accordance with the risk assessments conducted prior to use and the manufacturer's instructions, including the required control measures.
- All members of staff use PPE when necessary and report any damage immediately.
- All members of staff are required to attend COSHH training
- Take 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 anyone else at risk.
- Cooperate with their employer and their delegated representatives to enable full compliance with current health and safety legislation.
- All members of staff ensure they are available for health surveillance, and report any health and safety concerns to the COSHH coordinator immediately.
- All members of staff communicate the COSHH procedures and control measures to pupils.
- Report any symptoms of ill health that may be attributable to substances in their work environment to their line manager.
- Report unsafe conditions, damage or defective plant equipment to Site Manager.
- Report defects in PPE provided.

### **3.4 Health and Safety (H&S) staff (currently through LA) will:**

- Provide advice and guidance to the Headteacher, SLT and employees as required
- Liaise with the School Business Manager as required

### **3.5 Occupational Health**

- Undertake health surveillance as required in conjunction with the Headteacher and health and safety staff.
- Liaise with ER as required.
- Allow the employee to have access to their health records when requested.

## **4. Organisation and Arrangements**

### **4.1 Identification and Use of Hazardous Substances**

The Headteacher and members of the Senior Leadership Team 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 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.

## **4.2 COSHH Risk Assessment**

### **4.2.1 COSHH Risk Assessment**

For every substance Mayfield School uses, there must be an 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 professional knowledge and methods of use of the substances in their area, including hazardous products, by products or waste.

If the Headteacher 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.

### **4.2.2 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
- PPE

Control measures must be taken in to account the action required in the event of an emergency.

### **4.2.3 Competence**

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

### **4.2.4 COSHH Risk Assessment Form**

Please see appendix 2

#### **4.2.5 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 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.

#### **4.2.6 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 that they are still valid and up to date.
- When there has been a change in workplace 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 5 years and must be available to inspection as part of annual inspections and audits.

If COSHH risk assessments are used as material evidence in a personal injury adverse event than 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.

### **5. 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.

Successful monitoring and review relies on commitment for the Headteacher and managers at all levels and should therefore be included as an integral part of the business planning process.

## Review

The content of this policy and its effectiveness will be reviewed on a 2 yearly review. In addition, this Policy will be the subject of review and amendment within this period should significant changes occur.

Mayfield School will store all COSHH forms and MDSS's electronically. With hard copies available in the appropriate areas (e.g. Pool Plant Room).

Further Reference and Associated Documents

- Mayfield School Health and Safety Policy
- Mayfield School COSHH Assessment form
- <http://www.hse.gov.uk/chemical-classification/legal/clp-regulation.htm>
- <http://www.hse.gov.uk/coshh/basics.htm>
- <http://www.hse.gov.uk/coshh/detail/coshh-clp-reach.htm>
- [HSE, Control of Substances Hazardous to Health 2002 \(as amended\), Approved Code of Practice](#)
- [HSE, Working with Substances Hazardous to Health; What you need to know about COSHH \(INDG 136 rev 5\)](#)

## 6. Appendix 1 Hazard Symbols and their meaning

Old Symbol	New Symbol	Hazard class and hazard category:
		Substances that can explode under certain conditions, such as when ignited, or heated, or in contact with certain other chemicals.
		Extremely flammable Highly flammable/flammable
		Oxidizing
		Gases under pressure: - Compressed gases - Liquefied gases - Refrigerated liquefied gases - Dissolved gases
		Corrosive
		Fatal or toxic when inhaled, swallowed or on contact with skin.
		Harmful (may cause damage to health) Irritant on contact with skin

 		<p>Indicates more serious , long term health hazards like:          Known to cause or suspected of causing cancer          May cause allergy or asthma symptoms if inhaled          Known to cause or suspected of causing genetic defects          May cause or suspected of causing damage to the unborn child/          Known or suspected of causing damage to organs          Fatal or harmful if swallowed and enters lungs on vomiting.</p>
		<p>Very toxic to aquatic life, with or without long lasting effects.</p>

## 7. Appendix 2: Mayfield School COSHH Risk Assessment

<b>Part 1</b>							
<b>To be completed by the responsible manager, Headteacher or competent nominated person</b>							
<b>Date</b>			<b>Assessor</b>				
1. Name of Task:							
2. List substance and supplier (current material safety data sheets (MSDS) must be attached)							
3. Quantity of substance used in one working day (approx)?							
4. Maximum of amount of substance stored?							
5. Exposure time to the substance during the working day? (Please indicate below)							
<1/2 hour	½-2 hours	2-4 hours	4-8 hours	Over 8 hours	All day		
6. Where does the task take place? (Please indicate below)							
Outside	Inside Well Ventilated	Inside Well Ventilated	Poorly	Confined Space			
7. Briefly describe how the product is used, including diluting, mixing, hand applying, brushing, spraying etc.							
8. Who works with this product and how often? (job titles e.g. cleaners, daily, weekly):							
9. Classification (Use symbols on MSDS). For definitions please refer to the COSHH policy.							
							
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Hazards associated with the use of substance:							
11. Does the substance have a Workplace Exposure Limit (WEL)? Yes/No							

12. Physical state of substances. (Please highlight)			13. Possibly entry routes in to the body (Please highlight)	
Vapour or mist	Dust	Solid	Ingestion/Swallowing	Eyes
Fumes	Liquid	Other	Inhalation/Breathing	Skin Contact
Powder	Gas		Absorption	Injection/Cut
14. What consideration has been given for substitution of hazardous substances with less hazardous one?				
Product is low Hazard		No suitable alternatives		Task requires this (type of) product
15. List type of people other than those in Part 8 who could be exposed and those who may be at special/increased risk e.g. visitors, the public, pregnant, asthmatic, vulnerable workers, etc.				
16. First Aid Measures (as detailed in MSDS)				
17. Fire Precautions (as detailed in MSDS)				
18. Actions to be taken in the event of an emergency e.g. spillage (as detailed in MSDS)				
19. Existing Control Measures e.g. safe systems of work, supervision, training, storage				
20. Personal Protective Equipment (PPE) Required: Yes/No Please specify:				
21. Environmental Protective Equipment (EPE) e.g. emissions/dust handling, noise prevention, bunds, drip trays, interceptors, spill kits, waste handling				

### Part 2 – Risk Assessment

Overall risk rating to be valued at Low/Medium/High	Low	Medium	High
Hazards inherent to the substance			
Risk of exposure due to:	Risk level without control measures		Risk level with control measures
The methods of use			
Ingestion/swallowing			
Inhalation/Breathing			
Eyes			
Skin Contact			
Overall risk level without control measures/PPE in place			
Overall risk level with control measures/PPE in place			
If overall risk level is high after control measures have been put in place can a lower risk substance, process or activity be used? YES/NO If no please state why.			
Is atmospheric sampling required and if so, at what frequency? YES/NO			
Is health surveillance required and if so list requirements? YES/NO			
Further action/controls:			
Review Date:-			
Signature of assessor:-		Date:	
Signature of manager/supervisor:-			
Who is responsible for the activity:-		Date:	