

Three Counties Academy Trust



COSHH Policy

#HS7

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Subject to periodic amendment. To be reviewed in full no later than 5th March 2029

Version history

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Common abbreviations and acronyms

AA	Admissions Authority	GPA	Government Procurement Arrangement
AAI	Adrenaline Auto-Injector (Epi Pen)	HASH	Herefordshire Association of Secondary Heads
ACM	Asbestos Containing Materials	HBV	Honour Based Violence
AFH	Academies Financial Handbook	HR	Human Resources
AHT	Assistant Headteacher	H&S	Health and Safety
AIR	Attendance Intervention Reviews	HoS	Head of School
APIs	Application Programme Interfaces	HSE	Health and Safety Executive
BAME	Black, Asian and Minority Ethnic Backgrounds	ICO	Information Commissioners Office
BCP	Business Continuity Plan	IHP	Individual Healthcare Plan
BFR	Budget Forecast Return	IRMS	Information and Records Management Society
CAMHS	Child and Adolescent Mental Health Services	IWF	Internet Watch Foundation
CEO	Chief Executive Officer	KCSIE	Keeping Children Safe in Education
CFO	Chief Financial Officer	KS1/2/3/4	Key Stage 1/2/3/4
CIF	Condition Improvement Fund	LAC	Looked After Child
CIN	Child in Need	LADO	Local Authority Designated Officer
CLA	Children Looked After	LGB	Local Governing Body
CMIE	Child Missing in Education	LLC	Low-Level Concerns

COO	Chief Operating Officer	LSA	Learning Support Assistants
COSHH	Control and Substances Hazardous to Health	MASH	Multi-Agency Safeguarding Hub
CP	Child Protection	MAT	Multi-Academy Trust
CPD	Continuing Professional Development	MFA	Multi-Factor Authentication
CSCS	Children's Social Care Services	MFL	Modern Foreign Language
CSE	Child Sexual Exploitation	NCSC's	National Cyber Security Centres
CTIRU	Counter-Terrorism Internet Referral Unit	NPQEL	National Professional Qualification in Executive Leadership
CWD	Children with Disabilities	PA	Persistent Absence
DBS	Disclosure and Barring Service	PAN	Published Admission Number
DDSL	Deputy Designated Safeguarding Lead	PECR	Privacy and Electronic Communications Regulations
DfE	Department for Education	PEP	Personal Education Plan
DHT	Deputy Headteacher	PEEP	Personal Emergency Evacuation Plan
DSE	Display Screen Equipment	PEx	Permanent Exclusion
DSL	Designated Safeguarding Lead	PLAC	Previously Looked After Child
DPO	Data Protection Officer	PP	Pupil Premium
EAL	English as an Additional Language	PSHE	Personal, Social and Health Education
ECT	Early Career Teacher	PSED	Public Sector Equality Duty

EHA	Early Help Assessment	PTFA	Parent, Teacher and Friends Association
EHCNA	Education, Health and Care Needs Assessment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
EHCP	Education, Health and Care Plan	RHE	Relationships and Health Education
EHE	Elective Home Education	RSHE	Relationships, Sex and Health Education
ELSA	Emotional, Literacy and Support Assistant	SALT	Speech and Language Therapist
ESFA	Education and Skills Funding Agency	SARC	Sexual Assault Referral Centre
EVC	Educational Visit Coordinator	SBM	School Business Manager
EWO	Education Welfare and Safeguarding Support Officer	SCCs	Standard Contractual Clauses
EYFS	Early Years Foundation Stage	SDQ	Strengths and Difficulties Questionnaire
FBV	Fundamental British Values	SEMH	Social, Emotional, and Mental Health
FGM	Female Genital Mutilation	SENCO	Special Educational Needs Coordinator
FOI	Freedom of Information	SEND	Special Educational Needs and Disabilities
FSM	Free School Meals	SLA's	Service Level Agreements
FTS	Find a Tender Service	STEM	Science, Technology, Engineering and Maths
GAG	General Annual Grant	TA	Teaching Assistant
GDPR	General Data Protection Regulation	TCAT	Three Counties Academy Trust
GIAS	Get Information about Schools	VSH	Virtual School Headteacher

Statement of intent

Three Counties Academy Trust (TCAT) understands the importance of protecting the health and safety of its employees, pupils, visitors, and contractors.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 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 risk assessments and appropriate control measures.

In accordance with the regulations, TCAT will 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 throughout our schools.

This policy aims to help TCAT and our schools:

- Assess the risk of hazardous substances used in each school and the impact they may have on health
- Implement appropriate control measures in order to manage identified risks
- Regularly monitor and review control measures to ensure that they are adequate
- Regularly monitor the extent to which staff and pupils are exposed to hazardous substances and conduct health surveillance where necessary
- Provide training for members of staff on the hazards, risks and precautions needed for effective control

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The Health and Safety at Work etc. Act 1974
- The Control of Substances Hazardous to Health Regulations 2002 (as amended 2004)
- Health and Safety Executive (HSE) (2012) 'Working with substances hazardous to health'

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies and documents:

- Health and Safety Policy (HS1)
- First Aid Policy (HS2)
- Manual Handling Policy (HS4)
- MAT Asbestos Management Policy (HS10)
- Risk Assessment Policy (SG8)
- Contractors Policy (ST2)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Definitions

For the purposes of this policy, a "**hazardous substance**" is any substance which may cause ill health if inhaled, ingested, injected, absorbed through the skin, or as a result of being released into the surrounding environment. Examples of hazardous substances which can cause ill health include:

- Substances used directly in activities, e.g., cleaning agents, adhesives and paints

- Substances generated from activities, e.g., fumes
- Naturally occurring substances, e.g., grain dust
- Biological agents, e.g., bacteria and other micro-organisms

For the purposes of this policy, “**health surveillance**” is a system of ongoing health checks for employees, conducted to help employers evaluate health risks and highlight concerns in workplace control measures. Health checks will be carried out for employees who are regularly exposed to hazardous substances such as solvents, fumes, and biological agents.

For the purposes of this policy, a “**Material Safety Data Sheet (MSDS)**” is a document which provides important health and safety information regarding a substance. The MSDS is provided by the supplier or manufacturer and indicates whether a substance is classified as hazardous.

3. Roles and responsibilities

The Headteacher/Head of School, in collaboration with the Trust Estate Manager is responsible for:

- Overseeing the day-to-day implementation of this policy in their school
- Ensuring that all members of their staff are fully aware of their roles and responsibilities in relation to this policy, as well as the necessary control measures, they are required to undertake

The Trust Estate Manager/COSHH Coordinator is responsible for:

- Ensuring that all members of staff receive effective COSHH training
- Providing safe storage and disposal arrangements for hazardous substances
- Purchasing personal protective equipment (PPE) and ensuring that this is regularly reviewed, of an appropriate standard, and in line with the Health and Safety Policy
- Ensuring that, where possible, the use of hazardous substances is avoided
- Ensuring that risk assessments are completed where the use of hazardous substances cannot be avoided, and effective control measures are in place
- Ensuring that an up-to-date record is maintained of all hazardous substances used in each school, and that they are clearly labelled

- Conducting formal assessments of the health risks to all those at each school
- Preventing and controlling the exposure of hazardous substances
- Ensuring the proper use of control measures, e.g. PPE, is adopted
- Ensuring that the controls used are necessary, safe, and regularly reviewed
- Conducting health surveillance for staff where necessary
- Providing instruction, information, and training on the use of hazardous substances

All members of staff are responsible for:

- Familiarising themselves with this policy
- Where relevant to their role, using hazardous substances in accordance with the risk assessments conducted prior to use and the manufacturer's instructions, including the required control measures
- Using PPE when necessary and reporting any damage to the Trust Estate Manager immediately
- Attending COSHH training sessions where required
- Ensuring they are available for health surveillance where necessary
- Reporting any health and safety concerns to the Trust Estate Manager, the Executive Headteacher/CEO or the Chief Finance Officer immediately
- Communicating COSHH procedures and control measures to pupils where needed

4. COSHH procedures

TCAT will recognise the important procedures which need to be followed to ensure effective provision of COSHH, in line with regulations.

Prior to using a hazardous substance, the Trust Estate Manager will conduct a risk assessment, taking into account the possible hazards that may occur as a result of using the substance. In all instances, the Trust Estate Manager will consider potential risks and whether the use of the hazardous substance is important to the learning experience. The risk assessment will describe the control measures taken when using the substance, such as using appropriate PPE. Risk assessments will be produced in conjunction with the MSDS and consider any individuals who are likely to be affected by its use.

The procedures and hazards identified in the risk assessment will be communicated to relevant members of staff, with copies of the risk assessment provided. Copies are also kept in the COSHH register held by the Trust Estate Manager for re-use, training and staff induction purposes.

Risk assessments will also be carried out for exposure to biological agents, e.g. vomit and blood.

All risk assessments are reviewed on a termly basis by the Trust Estate Manager and any further necessary information is added.

5. Control measures

TCAT will eliminate the use of any hazardous substances unless absolutely necessary.

Where the school has hazardous substances, it will manage the risks to staff and pupils and have risk assessments in place. COSHH risk assessments will cover the following areas:

- Identifying hazards
- Identifying who may be harmed and how
- Evaluating risks and developing control measures
- Recording findings and implementing control measures
- Reviewing the risk assessment regularly and updating when necessary

All pupils will be made fully aware of the safety procedures. Extra caution will be taken when using any hazardous substances involved in teaching, e.g., in science lessons. When pupils are using a hazardous substance, at least two members of staff will be present to supervise pupils and handle potential emergencies.

There is an increased legal focus on mental health from the HSE, and government bodies and employers must carry out risk assessments where stress or psychological harm could occur as a result of physical or mental health risks in the workplace, including those associated with hazardous substances. Employers must conduct risk assessments to identify and evaluate hazards, risks and implement control measures to eliminate or minimize risks.

In order to minimise risks, the Trust Estate Manager will aim to substitute hazardous substances for less hazardous alternatives, where these are available. Where substances cannot be eliminated or substituted for less hazardous alternatives, the amount of time for exposure will be minimised and the amount of the substance used will be reduced as much as possible.

Where possible, substances will be used in isolation, away from other areas of the school, in order to prevent exposure to others. Appropriate ventilation, e.g. opening windows and external doors will be used. Appropriate PPE will be worn by all those exposed to the substance.

Hazardous substances will be stored safely and securely. Substances will be locked away, out of sight and reach of pupils, with only appropriate members of staff having approved access. Only staff trained in COSHH will be given access to hazardous substances – pupils will not be permitted to access hazardous substances.

After use, substances will be safely disposed of by staff trained in COSHH.

The Trust Estate Manager will ensure that control measures are adequately monitored and maintained. Members of staff will report any defect in control measures to the Trust Estate Manager immediately. All concerns regarding COSHH will be handled with the utmost importance and priority.

The Trust Estate Manager's checks on control measures, and any actions taken to remedy faults, will be recorded in a logbook, and kept for at least five years.

6. Health surveillance

In accordance with COSHH regulations, TCAT will conduct health surveillance in the following instances:

- Where an individual is exposed to a substance which is associated with a disease or adverse health effect
- Where an individual is exposed to a substance which is likely to result in a disease or adverse health effect
- Where an individual displays signs of a disease or adverse health effect

Health surveillance will be conducted by the Trust Estate Manager, who will obtain all the information on the individual's health and keep a written record of this. Records will be kept for a minimum of 40 years from the last entry. The individual concerned will be able to access their health records at any time they should request it.

TCAT will recognise that health surveillance may need to be carried out by the school nurse; in these instances, the same procedure will be followed.

All individuals at a TCAT school will be made aware that they have a responsibility to provide honest and true health information and should declare any changes to their health that occur due to the exposure of a hazardous substance.

7. Planning for accidents and emergencies

TCAT will aim to effectively manage every identified risk involved with the use of a hazardous substance; however, there may be instances when accidents, such as spillages, could occur and may be damaging to an individual's health.

A detailed emergency plan will be established prior to the use of any substance by the Trust Estate Manager in collaboration with the Headteacher/Head of School as part of the risk assessment. The risk assessment undertaken for each hazardous substance will be kept with the related substance, so that members of staff are aware of the emergency procedures and first aid.

Incidents will be responded to promptly and any harmful effects will be minimised where possible. Emergency services will be contacted immediately where the incident cannot be resolved by a trained member of staff. Only members of staff trained in COSHH, and first aid will attempt to provide treatment to an individual, following the procedures outlined in the First Aid Policy.

Emergency procedures will be practised regularly as part of a 'safety drill' method, to ensure that all individuals throughout TCAT are aware of the steps to follow.

Accidents and emergencies will be reported to the Headteacher/Head of School immediately using the appropriate form and will alert the Trust Estate Manager.

8. Training

The Trust Estate Manager will conduct training for staff on a regular basis, ensuring that all staff are aware of:

- The names of the substances they work with and could be exposed to, as well as the associated risks and the use of MSDS
- The appropriate precautions and control measures that they are expected to take to protect themselves, pupils and others on site
- The importance of PPE and how it should be used

- The results of any exposure and health surveillance, whilst maintaining confidentiality and not revealing any identities
- The correct measures to take when supervising pupils who are handling substances
- The emergency procedures

Training will be updated in response to any changes required to the provision of COSHH, e.g. additional information required on risk assessments or new PPE equipment, as well as in response to any incidents occurring at any TCAT school.

Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled full review date for this policy is 5th March 2029.

Signed by:

_____ Executive Headteacher/CEO

Date: _____

_____ Board appointed Trustee

Date: _____

Appendix A: COSHH Risk Assessment Template

Important note: *This risk assessment identifies typical examples and controls to illustrate how schools may manage certain risks. These can be used as a guide to think about hazards in your school and the steps needed to manage those risks. In order to be compliant with the law and protect your community, you must consider the specific hazards and controls your school needs and **must not** use this template without assessing your school's risks.*

Name of school

Assessment conducted by:	Job title:	Covered by this assessment:
Date of assessment:	Review interval:	Date of next review:

Risk rating		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	Major: Causes major physical injury, harm or ill health.	High (H)	H	Medium (M)
	Severe: Causes physical injury or illness requiring first aid.	H	M	Low (L)
	Minor: Causes physical or emotional discomfort.	M	L	L

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Insufficient awareness of school procedures	Staff, pupils and visitors	<u>M</u>	<ul style="list-style-type: none"> The school has a COSHH Policy in place with effective procedures for managing hazardous substances and clear responsibilities for staff. The Headteacher/Head of School oversees the implementation of the COSHH Policy and ensures all staff understand it and receive training in line with their duties. The school assigns a COSHH coordinator who takes overall responsibility for monitoring control measures and is competent to check that: <ul style="list-style-type: none"> Processes are not emitting uncontrolled contaminants. Control equipment and PPE continues to work as it was designed. Staff follow the safe way of working. All possible routes of exposure, e.g. skin contact, breathing, swallowing, are considered when determining safe systems of work and control measures. 	<p>[Outline what additional steps are required in line with an assessment of your school's specific circumstances to eliminate the hazard or control the risk].</p>	Trust Estate Manager	Signature Date

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> The effects of acute and chronic exposure are considered, alongside long-term and short-term effects. Control measures are devised that adequately reflect the quantity of substance used, how it may get into the body and how much harm it can cause. Staff are consulted when developing control measures and they understand how to report concerns or issues. Staff to pupil ratios reflect the enhanced risks posed by the hazardous substances used in any lessons to ensure adequate supervision. 			
Unnecessary use of hazardous substances			<ul style="list-style-type: none"> The school limits the use of hazardous substances to where they are absolutely necessary. Where hazardous substances must be used, procedures are in place to minimise the time and extent of exposure. The COSHH coordinator checks if harmful substances or products can be substituted for a safer one, or for a safer form, e.g. paste rather than powder, where possible. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Failure to follow product guidance	Staff, pupils and visitors		<ul style="list-style-type: none"> • Product information is checked and the manufacturer or supplier's guidance on the correct use is followed. • Where information is missing or incomplete or the school has concerns, the school contacts the supplier for support. • The supplier is asked for information on safe use for products where a safety data sheet or adequate labelling is not provided. • A hazard checklist is completed for each new substance used to establish: <ul style="list-style-type: none"> - What danger labels it has. - If it produces gas, fume, dust, mist or vapour. - If it is harmful to breathe or If it can harm skin. - If it is likely harm could arise due to the way the product is used. - If a safer product can be used. - Mitigations and control measures that can be put in place. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> The school uses the HSE COSHH e-tool to inform its control measures on the use of hazardous substances. The school maintains a COSHH file in the store room which is kept up-to-date with relevant records, e.g. hazard assessments, safety data sheets, incident reports. 			
Improper use of personal protective equipment (PPE)			<ul style="list-style-type: none"> A Personal Protective Equipment (PPE) Risk Assessment Form is undertaken before any activity involving hazardous substances to identify the necessary PPE. The school provides the necessary PPE for each task suitable for the intended user, i.e. the correct size and fit. PPE is stored and used in line with the manufacturer's instructions. The COSHH Coordinator instructs staff on the correct and safe use of PPE and puts arrangements in place, e.g. supervision, to ensure proper use. The Trust Estate Manager implements arrangements for the maintenance, replacement and storage of PPE as required. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> • Staff pause activities if a pupil is not wearing appropriate PPE, e.g. safety goggles have been removed. • Pupils failing to follow rules on the use of PPE are not allowed to take part in activities and are managed in line with the Behaviour Policy. 			
Breathing in of hazardous substance			<ul style="list-style-type: none"> • The school follows procedures to ensure suitable fresh air provision. • Equipment and products that may emit harmful vapours, e.g. printers, are stored and used in well-ventilated rooms. • A local exhaust ventilation is installed where necessary, e.g. in the D&T room where wood dust is regularly produced. • Where local exhaust ventilation is used, it is subject to thorough examination and testing at least once every 14 months by a competent person. • The product guidance is followed in the event of a harmful substance being breathed in. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> • Medical assistance is sought if there are any concerns about the effects of breathing in a substance. • Staff who regularly come into contact with hazardous substances as part of their duties undergo appropriate health checks as required. 			
Skin contact with hazardous substance			<ul style="list-style-type: none"> • Staff and pupils are reminded not to eat, touch their eyes or face after handling hazardous substances until they have followed correct disinfecting procedures, e.g. hand washing. • Staff are instructed on how to put on gloves and remove them without contaminating skin. • The manufacturer or supplier's instructions are followed in the event of the substance coming into contact with skin. • Hazardous substances are used nearby to easily accessible water points wherever possible to allow skin to be washed quickly. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Improper storage and disposal			<ul style="list-style-type: none"> • Lidded bins are provided in all rooms where hazardous substances are commonly used, e.g. for cleaning. • A stock list is maintained recording where all hazardous substances are stored. • Hazardous substances are stored in locked rooms or cupboards and never left unattended when in use if pupils are nearby. • Hazardous substances are kept in their original container – where they must be moved, e.g. for dilution or mixing, they are placed into an appropriate container with proper labelling and hazard information. • Spillages, leaks or unplanned releases are dealt with immediately in line with the safety data sheet for the substance(s). • Appropriate warning signs are prominently displayed near storage areas for dangerous substances. • The disposal of hazardous waste follows the manufacturer's guidance and UK law. • The COSHH coordinator oversees the disposal of hazardous waste in line with school procedures. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Improper use of control equipment			<ul style="list-style-type: none"> The user manual for control equipment, e.g. ventilation, is followed – where a user manual is not available, professional assistance is sought to devise one. Routine checks are undertaken on control equipment in line with the user manual and manufacturer's instructions. The Trust Estate Manager ensures defects are remedied as soon as possible. A logbook is kept recording checks and actions for maintenance on control equipment. 			
Fire and explosion			<ul style="list-style-type: none"> Highly flammable substances are only purchased if suitable less flammable substances are not available. Flammable substances are stored away from sources of electricity. Highly flammable substances, e.g. fertilisers, are stored in secure fire-resistant rooms in remote areas of the premises. The Trust Estate Manager conducts daily checks to ensure flammable substances are being stored correctly. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> Staff have due regard for the school's MAT Fire Safety Policy in the use and storage of substances. 			
Ineffective response to emergency situation			<ul style="list-style-type: none"> Procedures in the school's Invacuation, Lockdown and Evacuation Policy are followed as necessary in response to a major incident involving hazardous substances. The COSHH coordinator ensures each substance has its own plan of action for emergency situation, e.g. first aid procedure. Emergency services are contacted immediately, and medical assistance is sought as necessary. Hazardous substances which pose a contact risk are used near easily accessible water points as much as possible to facilitate washing of the affected area as necessary. 			
Insufficient cleaning procedures			<ul style="list-style-type: none"> COSHH measures outlined in the School Cleaning Policy are followed by all staff. Areas of spillages, leaks or unplanned releases are cordoned off if necessary to 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<p>prevent exposure until it is safe to re-enter.</p> <ul style="list-style-type: none"> • Activities are paused in the event of a spillage to allow immediate clean up. • The school checks with any cleaning companies or contractors used that staff have completed suitable COSHH training. • Cleaning products used by a third-party are checked by the COSHH Coordinator before they are approved for use on the premises. 			