

Three Counties Academy Trust



# COSHH Policy

## #HS7

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## **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

## 1. Legal framework

This policy has due regard to all relevant legislation and 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)
- HSE (2012) 'Working with substances hazardous to health'

This policy operates in conjunction with the following TCAT and school policies:

- Health and Safety Policy
- Asbestos Management Policy
- Manual Handling Policy
- Risk Assessment Policy
- First Aid Policy
- Contractors Policy

## 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 Executive Headteacher/CEO, in collaboration with the Chief Finance Officer is responsible for:

- Overseeing the day-to-day implementation of this policy
- Ensuring that all members of 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
- Ensuring that all members of staff receive effective COSHH training

The Trust Site Manager/COSHH Coordinator is responsible for:

- 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 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 Site 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 Executive Headteacher/CEO and 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 Site 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 Site 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 Site 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 Site Manager and Executive Headteacher/CFO and any further necessary information is added.

## **5. Control measures**

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

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

The Trust Site 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 Site 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 Site 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 Site Manager.

## **8. Training**

The Trust Site 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.

## 9. 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, Chief Finance Officer and Trust Site Manager in conjunction with Headteachers/Heads of School and the Governing Board. Any changes made to the policy will be amended by the Executive Headteacher and will be communicated to all members of staff.

The next scheduled review date for this policy is 31<sup>st</sup> August 2024.

Signed by:

_____	Executive Headteacher	Date: _____
_____	Chair of Trustees	Date: _____



## Schedule of revisions

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