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Contents

1. COSHH Introduction

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) was introduced to protect the health and safety of staff from the risk of hazardous substances at work. To prevent ill health. All reasonable steps need to be taken to ensure that exposure to hazardous substances are controlled to within statutory limits.

COSHH applies to all the substances where exposure could lead to an adverse effect on health, i.e. cause illness such as:

- Natural materials can be harmful. For example, wood dust can cause asthma or eye problems, stone or concrete dust can cause lung disease such as silicosis, lung cancer. Citrus oils can cause skin problems.
- Wet working e.g. catering and cleaning can cause dermatitis.
- Paint, ink, glue, detergent can cause asthma.
- Biological agents can cause infections, allergies, poisoning etc which can be caught as a direct result of the work activity.

Substances which represent a danger to safety can cause injury as opposed to illness, as a result of their flammability, or explosive nature e.g. solvent based products which give off flammable vapour, clouds of dust from everyday materials – this can be from wood dust, or flour which can explode if ignited. Physical hazards such as this is excluded from COSHH. This also includes lead, asbestos and ionising agents which have their own legislation.

2. Definition of Substances Hazardous to Health

COSHH contains specific definitions of hazardous substances included any chemical classified and labelled under the chemicals Hazard information and Packaging for Supply Regulations 2002 as being:

CLP pictograms for chemical hazard labelling

 GHS 01 *(Explosive)*	 GHS 02 *(Flammable)*	 GHS 03 *(Oxidising)*
 GHS 04 *(Gas under pressure)*	 GHS 05 *(Corrosive)*	 GHS 06 *(Acutely toxic)*
 GHS 07 *(Moderate hazard)*	 GHS 08 *(Health hazards)* *(e.g., sensitisers, carcinogens)*	 GHS 09 *(Hazardous to the aquatic environment)*

3. How do we Find Out if a Substance or Product is Harmful?

- Check the information that came with the product i.e. the product label or the Safety Data Sheets –
    - suppliers and manufacturers have a legal duty to supply Safety Data Sheets
    - if the supplier doesn't supply the Safety Data Sheets, then you must ask for them, alternatively you can download them off of the supplier's website.
    - Safety Data Sheets will tell you about the hazards from each substance, how to store them correctly and what to do in emergency exposures.
    - Safety Data Sheets should be available for all employees and students who use the products which are hazardous to their health.
- Ask the supplier or CLEAPSS
- Check the internet, e.g. www.hse.gov/COSHH which will have up to date information and free document downloads.

4. Workplace Exposure Limits

Workplace Exposure Limits (WEL) is set for a number of substances hazardous to health. A WEL is intended to prevent excessive exposure to specific hazardous substances by containing exposure below a set limit. The HSE publication EH40 Workplace Exposure Limits gives details of substances with WEL. A WEL must not be exceeded. WEL information will be on Safety Data Sheets and sometimes on a product label.

Where there is Workplace Exposure Limits, a thorough COSHH risk assessment needs to be conducted using the related Safety Data Sheet and or CLEAPSS information.

The Trust schools departments: science, maintenance, horticulture, design and technology, art, cleaning services, catering, preparation rooms etc may all use substances or products with a designated WEL e.g. glues, dusts, ammonias, chlorine etc

5. How Might you be Exposed to Harmful Products?

1. Exposure by breathing in
    - Once breathed in, some substances can attack the nose, throat or lungs while others get into the body through the lungs and harm other parts of the body e.g. the liver.
2. Exposure by skin contact
    - Some substances damage the skin, while others pass through it and damage other parts of the body. Skin gets contaminated by:
        - Direct contact with the substance e.g. if you touch it or dip your hands in it.
        - Splashing

    - Substances landing on the skin i.e. airborne dust.
    - Contact with contaminated surfaces – this includes contact with contamination inside protective gloves.
3. Exposure by swallowing
    - People transfer chemicals from their hand to their mouths by eating, smoking etc without washing their hands first.
4. Exposure to the eyes
    - Some vapours, gases and dusts are irritating to eyes. Caustic fluid splashes on eyes can damage eyesight permanently.
5. Exposure by skin punctures
    - Risks from skin punctures such as needle stick injuries, or from some types of machinery or equipment are rare, however, they can cause infections or reactions which are very harmful substances such as drugs, substances or chemicals.

6. COSHH Risk Assessment

A COSHH risk assessment is about taking sensible steps to prevent ill health. You need to know how staff are exposed, and by how much, before you can decide if you need to do anything to reduce their exposure. The Safety Data Sheet (SDS) should be referred to when completing a COSHH risk assessment using form HSF008 Control of Substance Hazardous to Health (COSHH) Assessment. The SDS is not an assessment it is an advisory document. SDS needs to be attached to the COSHH risk assessment when it is completed.

When the task involves very small amounts of material, even if these are harmful and there is little chance of it escaping, the risk is low. However, the risk in a different task such as cleaning up and disposal will be higher due to the harmful substance coming into contact with the skin or being inhaled.

The risks associated with hazardous substances must be assessed and eliminated or reduced as far as possible. Control measures are mixture of equipment and ways of working to reduce exposure and must be properly used. Certain mechanical ventilation controls (Local Exhaust Ventilation [LEV] and fume cupboards) have specified examination periods and record keeping requirements which must be adhered to.

Faulty or defective equipment must be reported to Premises/Site Manager. All control measures must be monitored to ensure that exposure levels are maintained within safe limits and any failures be quickly identified and addressed.

HSF008 Control of Substance Hazardous to Health (COSHH) Assessment needs to be completed for substances and products that you use which are hazardous e.g. glues, dust, fumes, detergents, micro-organisms, chemicals etc.

1. What are exposure control measures?
    - Control measures are always a mixture of equipment and ways of working to reduce exposure. The right combination is crucial. No measures, however practical, can work unless they are used properly.
    - So any 'standard operating procedure' should combine the right equipment with the right way of working. This means instructing, training, and supervising the staff performing the tasks.
    - You need control measures that work and continue to work all day, every day.

2. Choosing control measures

In order of priority:

- Eliminate the use of a harmful product, or substance and use a safer one.
- Use a safer form of the product, e.g. paste rather than powder.
- Change the process to emit less of the substance.
- Enclose the process so that the product does not escape.
- Extract emissions of the substance near the source.
- Have as little staff members in harm's way as possible.
- Provide personal protective equipment (PPE)

3. Control equipment and maintenance.
    - Control equipment includes ventilation to extract dust, mist and fume; glove boxes and fume cupboards; spray booths and refuges (clean rooms in dirty work areas); using water to reduce dust, and systems for disinfecting cooling water.
    - Check the Equipment user manual as this should set out schedules for checks, maintenance and parts replacement and operator use.
    - Records need to be kept in a simple logbook of pre-start check, maintenance; replacement parts and these records must be kept for at least five years. Discuss with the Premises Manager for who is responsible for which checks.
    - When you purchase new equipment as a control measure under COSHH you need to inform the Premises Manager so that arrangements can be put in place to have it serviced and maintained and logged on the Equipment Asset Register.
    - All substances/products marked with a hazard symbol (European or International) must be kept in a lockable metal cabinet and locked when not in use.
    - A separate lockable metal cabinet is required for all chemicals and products which are flammable.

- Both of the above two metal cabinets must have on their door's flammable and/or hazardous warning signs and there should be safe management of the cabinet keys.

4. Personal Protective Equipment

Personal protective equipment ("PPE") is often used as part of control measures. PPE only protects the wearer if it is used and worn correctly. It needs checking and maintaining because, if it fails, it no longer provides protection and exposes the wearer to danger. Supervisors must periodically check PPE is being worn correctly, and give instructions in the safe handling, use, storage and maintenance of all PPE.

7: New Legislation:

New regulations came into effect from October 1st, 2023, for supplying explosives precursors and poisons. This put in place new requirements on the supply of chemicals which are commonly used in schools.

Explosives precursors: acetone (propanone) aluminium powders, hydrochloric acid, Hydrogen peroxide, Sulfur and Sulfuric acid.

Poisons: Ammonia, Phenol, Sodium hydroxide, Sodium nitrate, and Sodium hypochlorite solutions.

The regulations state that businesses and professional users should be verified by the supplier every time a new purchase is made of these regulated chemicals.

Where they are being supplied frequently to the same business, verification can occur every 18 months, or whenever there is a change or deviation from normal purchasing patter.

The supplier must obtain the following from the school.

The schools name.

The name of the Individual making the purchase

Photographic identification (this can be Passport, Driving licence, School photo Id) of the person making the purchase.

The schools VAT registration number.

There is no licence which applies to these regulations.

This information should be provided when requested by the supplier, so there is no need to provide this information in advance.

8: COSHH Inventory & Authorised Chemical Product List

Each Academy is required to produce a written inventory of every hazardous substance to which employees and students are likely to be exposed during the work activities, i.e. chemical and biological agents and dusts, etc.

Checks should be made that the inventory identifies that only Authorised Chemicals are used and purchased.

The Premises/Caretaking Department collects the departmental chemical inventory for fire safety purposes.

The Trust Head of Estates, through yearly auditing will monitor that the Inventory on site states that only authorised substances and products are being used.

All COSHH related equipment purchased needs to be logged on the Asset Register so ensure they are serviced, maintained and portable appliance tested. The Premises Managers are responsible for this register.

9: Training, Information, Competence and Reporting Incidents

1. Training

All employees who use or are likely to have contact, with hazardous substances need to receive COSHH awareness training as part of their induction and have regular refresher training. This can be done through The Trusts e-learning system called Handsam.

All students who use hazardous substances should be given COSHH information as part of their lesson plan.

2. Competence

- Employees who conduct COSHH risk assessment need to be competent. This can be achieved through training, information, instruction, and experience.
- Staff responsible for the maintenance and servicing of COSHH equipment should receive appropriate training.
- Involve staff in completing COSHH risk assessments and encourage them to make suggestions for improvement.
- All employees need to report any incidents spillages, contamination, accidents, and ill-health using HSF002 Accident Investigation Report Form.
- Employees must use any protective equipment or other control measures fully and properly and attend health or medical surveillance programmes if identified as being necessary.

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3. Information

    - Hazard warning signs should be clearly displayed such as biohazards, along with mandatory signs such as wear protective gloves, masks.
    - Employees should be given and have access to COSHH assessments and safety data sheets, given information on what to do in an emergency and how to report incidents.
    - Copious amounts of resources can be downloaded from HSE, Gov or CLEAPSS websites.

4. Instruction

    - Explain to your staff and anyone else who needs to know, what the dangers are. It is poor practice just to hand them a page of written information.
    - Show staff how to use control measures properly, and how to check that they are working.
    - Carry out practice drills for cleaning up spills safely – do this before any spillages happen.
    - If staff need to use respirators, they also need face fitting and training.
    - If they need to use protective gloves, they need to know how to put them on and take them off without contaminating their skin.

10: Health Surveillance

1. Monitoring exposure

    - Monitoring normally means air sampling but it may also involve taking biological samples, e.g. breath or urine.
    - Monitoring records should be kept for at least five years.

2. Health checks

- If HSE, or other information, shows there is a problem with health in a particular area, such as asthma or dermatitis which might be associated with some wood dusts or baking with flour, your employees may need special health checks (or Health Surveillance)
- The most common checks are for respiratory disease such as asthma and skin disease.

- It is a legal requirement to carry out Health Surveillance if your health is at risk from the work you do. The Human Resource Department is responsible for arranging health checks with the occupational health provider.

3. Health records

- A simple health record of any health surveillance carried out.
- COSHH requires health records to be kept for at least 40 years.

Appendices

- **HSF0002 Accident Incident Investigation Report Form**
- **HSF0008 Control of Substances Hazardous to Health (COSHH) Assessment**
- **HSF0018 Personal Protective Equipment Issue**

Any questions concerning this policy please contact.

The Trust Head of Estates

or

Assistant Head of estates and Health & Safety Manager