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COSHH Policy

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Statement of intent

Inclusive Education Trust 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 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.

Reference to 'the school' in this document represents Reigate Valley College, Wey Valley College and Fordway. Reference to 'the governing board' represents the Management Committees of all three schools. Reference to the CEO represents the Heads of each Centre and/or the Director of Education .

1. Legal framework

- 1.1. This policy has due regard to the related statutory legislation, 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 (amended 2004)
- 1.2. This policy will also have due regard to the following guidance:
 - HSE (2012), 'Working with substances hazardous to health'
- 1.3. This policy will be implemented in conjunction with the following policy:
 - Health and Safety Policy.

2. Definitions

- 2.1. For the purpose of this policy, a hazardous substance is any substance which may cause ill health if inhaled, ingested, injected or absorbed through the skin, or as a result of being released into the surrounding environment.
- 2.2. There are many examples of hazardous substances which can cause ill health, including:
 - 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 such as bacteria and other micro-organisms.
- 2.3. For the purpose of this policy, health surveillance is a system of ongoing health checks for employees, in order to provide data to help employers evaluate health risks and highlight concerns in workplace control measures.
- 2.4. Health checks are for employees who are regularly exposed to noise, vibrations, solvents, fumes, biological agents and hazardous substances.
- 2.5. For the purpose of this policy, a Material Safety Data Sheet (MSDS) is a document which provides important health and safety information regarding a substance. This is provided by the supplier or manufacturer, and indicates whether a substance is classified as hazardous.

3. CEO responsibilities

- 3.1. The CEOoversees the day-to-day implementation of this policy and ensures 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.

- 3.2. The CEO ensures that all members of staff receive effective COSHH training.
- 3.3. The CEO ensures that, where possible, the use of hazardous substances is avoided.
- 3.4. The CEO ensures that risk assessments are completed, where the use of hazardous substances cannot be avoided and effective control measures are in place.
- 3.5. The CEO ensures that an up-to-date record is maintained of all hazardous substances which are used, and they are clearly labelled.

4. Site manager (School Business Manager) responsibilities

- 4.1. The school business manager provides safe storage and disposal arrangements for hazardous substances.
- 4.2. The school business manager purchases personal protective equipment (PPE), ensuring that this is regularly reviewed, is of an appropriate standard and in line with the Health and Safety Policy.
- 4.3. The school business manager conducts formal assessments of the health risks to all those at the school.
- 4.4. The school business manager prevents and controls the exposure of hazardous substances.
- 4.5. The school business manager ensures the proper use of controls, such as PPE, are adopted.
- 4.6. The school business manager ensures that the controls used are necessary, safe and regularly reviewed.
- 4.7. Where necessary, the school business manager conducts health surveillance for staff.
- 4.8. The school business manager provides instruction, information and training on the use of hazardous substances.

5. Responsibilities of all members of staff

- 5.1. All members staff are responsible for familiarising themselves with this policy.
- 5.2. 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.
- 5.3. All members of staff use PPE when necessary and report any damage to the school business manager immediately.

- 5.4. All members of staff ensure they are available for health surveillance, and report any health and safety concerns to the school business manager immediately.
- 5.5. All members of staff communicate the COSHH procedures and control measures to pupils.

6. COSHH procedures

- 6.1. In order for the school to be compliant with the COSHH regulations, it recognises the important procedures which need to be followed to ensure effective provision of COSHH.
- 6.2. Prior to using hazardous substances, the school business manager conducts a risk assessment, taking into account the possible hazards that may occur as a result of using the substance.
- 6.3. In all instances, the potential risks are considered and whether the use of the hazardous substance is important to the learning experience.
- 6.4. The risk assessment describes the appropriate control measures that are taken when using the substance, such as using appropriate PPE.
- 6.5. Risk assessments are produced in conjunction with the MSDS and take into account any individuals, including visitors, staff, pupils and contractors, who are likely to be affected by its use.
- 6.6. The procedures and hazards identified in the risk assessment are communicated to the members of staff.
- 6.7. Copies of the risk assessment are given to the relevant members of staff. Copies are also kept in the COSHH register for re-use, training and staff induction purposes.
- 6.8. Risk assessments are also carried out for exposure to biological agents, e.g. vomit, blood, etc.
- 6.9. All risk assessments are reviewed on a termly basis by the CEO and any further necessary information is added.

7. Control measures

- 7.1. The school eliminates the use of any hazardous substances unless absolutely necessary.
- 7.2. All pupils are fully aware of the safety procedures and extra caution is taken when using any hazardous substances involved in teaching, for instance in science lessons.
- 7.3. Where substances must be used, the school business manager aims to substitute this for a less harmful substance in order to minimise risks.

- 7.4. Where the substance cannot be eliminated or substituted, the amount of time for exposure is minimised.
- 7.5. The amount of the substance used is reduced as much as possible.
- 7.6. Where possible, the substance is used in isolation, away from other areas of the school, in order to prevent exposure to others.
- 7.7. Appropriate ventilation is used, such as opening windows and external doors.
- 7.8. Appropriate PPE is worn by all those exposed to the substance, such as gloves, safety goggles, dust masks, etc.
- 7.9. When pupils are using a hazardous substance, at least three members of staff are present in order to supervise pupils and in the case of an emergency.
- 7.10. Hazardous substances are stored safely and securely.
- 7.11. All substances are safely disposed of after use by staff that are trained in COSHH.
- 7.12. Only staff trained in COSHH have access to hazardous substances.
- 7.13. Pupils are never permitted to access hazardous substances.
- 7.14. All substances are locked away, out of sight and reach of pupils, with only appropriate members of staff having approved access.
- 7.15. The school business manager ensures that these control measures are adequately monitored and maintained.
- 7.16. Members of staff report any defect in control measures to the school business manager immediately so that replacements can be provided.
- 7.17. All concerns regarding COSHH are handled with the utmost importance and priority.

8. Health surveillance

- 8.1. In accordance with COSHH regulations, the school conducts 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
- 8.2. Health surveillance is conducted by the school business manager, who obtains all the information on the individual's health and keeps a written record of this.
- 8.3. Records must be kept for a minimum of 40 years from the last entry.

- 8.4. The individual is able to access their health records at any time they should request it.
- 8.5. The school recognises that health surveillance may need to be carried out by the school nurse. In these instances, the same procedure will be followed.
- 8.6. All individuals at the school have a responsibility to provide honest and true health information, and declare any changes to their health that should occur due to the exposure of a hazardous substance.

9. Planning for accidents, incidents and emergencies

- 9.1. The school aims to effectively manage every identified risk that is 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.
- 9.2. A detailed emergency plan is established prior to the use of any substance by the CEO as part of the risk assessment.
- 9.3. The risk assessment undertaken for each hazardous substance is kept with each substance, so that members of staff are aware of the emergency procedures and first aid.
- 9.4. Incidents are responded to promptly, and the harmful effects are minimised where possible.
- 9.5. Emergency services are contacted immediately where the incident cannot be resolved by a trained member of staff.
- 9.6. Only members of staff trained in COSHH and first aid attempt to provide treatment to an individual.
- 9.7. Any accidents are reported to the CEO immediately, and recorded on OSHENS, Surrey's online reporting system.
- 9.8. The emergency procedures are regularly practised as part of a 'safety drill' method, to ensure that all individuals at the school are aware of the steps to follow.

10. Training

- 10.1. The school business manager conducts training for staff on an annual basis and ensures 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 at the school.
 - 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.

10.2. Training is conducted in response to any changes required to the provision of COSHH, e.g. additional information required on risk assessments, new PPE equipment, etc.

11. Policy review

11.1. This policy is reviewed every three years by the school business manager and the CEO.