



# **St Aloysius College**

## **Control of Substances Hazardous to Health (COSHH) Policy**

This Control of Substance Hazardous to Health (COSHH) Policy was evolved by consideration between staff and governors and was approved on .....

This policy will be reviewed on .....

## **CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH) POLICY**

### **1. Policy Statement**

The purpose of this policy is to describe the process to be followed in situations that require Control of substances Hazardous to Health as specified in the COSHH Regulations 2002. This Policy has been produced in accordance with The St. Aloysius' College Health and Safety Policy to ensure that all health and safety issues relating to the Control of Substances Hazardous to Health (COSHH) are adequately managed and controlled. The School is committed to protecting the health, safety, welfare and wellbeing of its employees and others who may be affected by the school's undertakings. It is essential therefore that everyone who works for or undertakes work on behalf of the school adheres to the requirements of this Policy.

It is the School's Control of Substances Hazardous to Health (COSHH) Policy to ensure that:

- a) The use of hazardous substances is avoided as far as is reasonable practicable.
- b) The risk to health arising from work activities involving hazardous substances is assessed.
- c) The exposure to hazardous substances is prevented or reduced by implementing adequate control measures.
- d) COSHH assessment and controls are monitored and adequately reviewed.
- e) Employees are provided with appropriate information, instruction and training.
- f) All relevant statutory requirements and, where reasonably practicable, best practice guidance is adhered to.

### **Scope**

The information, guidance and instruction within this policy covers the use of hazardous substances. The policy is applicable to all areas of the school; 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 and associated guidance provide a standardised approach for all persons who are responsible for work involving hazardous substances, ensuring consistency across the school.

### Definitions

The following are key definitions for this policy:

#### Hazardous substance

- A substance with the potential to cause harm if inhaled, ingested, injected or absorbed through the skin or released into the environment. Common substances such as cleaning materials, herbicides and pesticides can be hazardous and/or harmful to the environment. Hazardous substances occur in the following forms from packaged item, work process or waste: Substances or a mixture of substances classified as dangerous which carry warnings 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, mist, fibres, solids or smoke. These substances usually indicate their basic hazard group by having a warning symbol on the label. 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) Health and safety information written in a standardised format 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 • Is a careful examination of hazardous substances within the workplace and an evaluation of their potential to cause harm; taking into account the control measures/precautions that have been taken for their use. Please note that 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 • In respect to risk assessment, is the chance of a person being exposed to a hazard.

Severity • In respect to risk assessment, 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, 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 employees' health and which helps protect employees from health risks at work. Health surveillance is undertaken by occupational health.

**Roles & 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 The St. Aloysius' College Health and Safety Policy.

The Headteacher and Line Managers must ensure that:

- The use of hazardous substances is avoided. If this is not reasonably practicable then a COSHH assessment must be undertaken.
- Safer alternative products are used, where reasonably practicable. • Hazardous substances that are being used, or produced as part of the work process or produced as waste are identified.
- 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 procedures because MSDSs must be available for all hazardous products that are used/ stored.

- COSHH risk assessments for hazardous substances are undertaken and recorded. The completion of the assessment can be delegated to a competent nominated person, however, the departmental manager responsible for the activity must sign and agree to the assessment.
- 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.
- All staff receive adequate and appropriate COSHH training, instruction and information, specific to their tasks.
- A COSHH substance register exists and is reviewed and updated (G Drive in Departments).
- Any localised extraction systems or engineering controls are regularly inspected, examined and maintained in compliance with statutory requirements.
- 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 accidents and emergencies involving hazardous substances (e.g. spills).
- The COSHH assessment is 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. Notify other appropriate persons of actions to be taken.
- They recognise that Natural Rubber Latex is classed as hazardous to health, and must therefore follow the hierarchy of control below: Eliminate the risk where appropriate - gloves should only be worn where there is a risk of infection; or Substitute its use for another glove material where

appropriate - nitrile, vinyl, synthetic; or Limit exposure – to do this you should follow the HSE's policy which states: "Single use, disposable natural rubber latex gloves may be used where a risk assessment has identified them as necessary. When they are used they must be low-protein and powder-free."

- COSHH assessments are reviewed on a regular basis.
- COSHH assessments are retained for 5 years. (All assessments to be printed and retained within the relevant department for reference. An electronic copy should also be stored in Shared G Drive.
- Health and Safety Officer is notified immediately if an employee has been diagnosed with an occupational disease. (The Student Welfare Officer will report any occupational disease to the Health and Safety Executive (HSE) if the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) apply).
- Waste disposal paperwork is held on file for three years for hazardous substances and be easily accessible.
- If any person is exposed to a substance that may be harmful to their health by inhalation, ingestion, injection or absorption and immediate medical attention (hospital) is required, a copy of the relevant MSDS should, if possible, accompany the injured person to the hospital to assist the medical professionals with their treatment.

**Employees must:**

- Familiarise themselves with the relevant COSHH risk assessments, activity risk assessments, procedures and safe systems of work.
  - Use hazardous substances in accordance with the manufacturer's instructions and COSHH risk assessments (for non-hazardous substances following the instructions on the container).
  - Attend and follow instruction and training in the use of/contact with substances.
    - Immediately report any health symptoms arising from their work to their line manager, e.g. skin irritation, breathing problems.
    - Use all control measures (i.e. ventilation, PPE) in accordance with the COSHH assessment, safe system of work, instruction and training that has been provided.
    - Use/wear/store/maintain and clean PPE if provided, as required.

- Report any defects in PPE provided, to manager immediately.
- Assist in the compilation of risk assessments (where required). Make themselves available for any health or medical surveillance deemed necessary in relation to the substances.
- Ensure good standards of hygiene.
- Report any other health and safety concern to their manager immediately.

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

- Provide advice and guidance to, the Headteacher, Line Managers and employees as required
- Liaise with the COSHH Officer as required.

**Occupational Health (currently SLA through LA) will:**

- Undertake health surveillance as required in conjunction with the Headteacher and health and safety staff.
  - Keep all health surveillance records for a minimum of 40 years from date of last entry.
  - Liaise with the Corporate Health, Safety & Wellbeing Manager and health and safety staff as required.
  - Liaise with the recruitment and Human Resources Advisory Service (HRAS) as required.
  - Allow the employee to have access to their health records when requested.

**The COSHH Officer will:**

- Report to, and be accountable to, the school Health & Safety Committee and the Corporate (PAT) Health, Safety & Wellbeing Committee.
  - Advise managers across all Directorates in recognising risk and advise on appropriate control measures and risk assessments.
  - Liaise with health and safety staff (LA) on COSHH related issues and queries.

**Organisation & Arrangements**

The COSHH Managers' Guide must be read in accordance with this section.

**Identification and use of hazardous substances**

The Headteacher and Line Managers 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 the 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. They must ensure that a MSDS has been obtained and COSHH Risk Assessment has been completed.

Risk assessment COSHH Risk assessment For every substance St. Aloysius' College uses must have the Material Safety Data Sheet (MSDS) for it wherever possible. 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. CLEAPSS The school has membership of CLEAPSS which is a school science teaching advisory service, which produces advice and guidance on the use and disposal of standard substances and experiments used in the science laboratory. CLEAPSS produce standard and special risk assessments for those substances and experiments and are used in The King's School science department. Any unusual substances or non-generic experiments are always checked against CLEAPSS advice via telephone/email/website. The CLEAPSS Hazards are therefore generally accepted as an alternative to writing a school risk assessment. Any new products purchased are added to the register.

#### 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
- Personal protective equipment (PPE) For further details you must refer to and comply with the COSHH Managers' guide. Control measures must take into account the action required in the event of an emergency.

### **Competence**

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

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

Communication, information, instruction & 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.

#### **COSHH Assessment record and review**

All COSHH assessments must be recorded. For this you must use the COSHH Assessment form (see Appendix 3).

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 work 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 five years and must be available for inspection as part of annual inspections and audits. If COSHH risk assessments are used as material evidence in a personal injury adverse event then 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.

#### Monitoring & 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 from the Headteacher and managers at all levels and should therefore be included as an integral part of the business planning process. Directorate Health and Safety Staff will also carry out periodic inspections and audits to monitor adherence of this policy.

#### Review

The content of this Policy and its effectiveness will be the subject of a two-yearly review in conformity with the school's Health & Safety Policy. In addition, this Policy will be the subject of review and amendment within this period should significant changes occur. This policy is subjected to quality control procedures and hence previous issues of the document will be archived.