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COSHH Policy

Non-Statutory

Reviewed Three-Yearly

Signed (Chair of the Trust)

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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 school's 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 Rivermead Inclusive Trust (RIT) is committed to protecting the health, safety, welfare and wellbeing of its employees and others who may be affected by the RIT or individual school undertakings. It is essential therefore that everyone who works for or undertakes work on behalf of the RIT adheres to the requirements of this Policy.

2. Purpose

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

3. Scope

The information, guidance and instruction within this policy covers the use of hazardous substances. The policy is applicable to all areas of the RIT and its associated schools. 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 RIT 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 RIT and its associated schools.

4. 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.

Material Safety Data Sheet (MSDS)

- Health and safety information written in a standardised format and provided by the supplier or manufacturer of a substance. This must not be confused with the Risk Assessment. It only identifies if the substance is hazardous and details important information for its use and disposal.

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 the COSHH folder/ hardcopy of COSHH assessments, MSDS 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 and has been trained and familiarized with both the MSDS and risk assessment. The Facilities, Health and Safety Manager is available for advice and assistance.

5. 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 and can be accessed initially via Line Managers. 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.

6. Labelling

All packaged hazardous substances should be labelled in accordance with current regulations. Labelling is undergoing a transition to which Appendix A explains the differences. This Appendix should be brought to the attention of all staff and can be reproduced for the display at the source of any hazardous substance.

7. Exceptions to COSHH

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.

8. 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 school's Health and Safety Policy.

8.1. The Headteacher and Line Managers must ensure that:

- All hazardous substance are identified.
- The use of hazardous substances is avoided. Safer alternative products must be used, where reasonably practicable. If this cannot be achieved then a COSHH assessment must be undertaken, using the MSDS as a guide to formulate the assessment.
- A copy of the MSDS is obtained for all products that are used. This must be a requirement of local purchasing procedures and communicated to the supplier when ordering new items
- COSHH risk assessments for hazardous substances are undertaken and recorded by completing the COSHH assessment form at Appendix 2. 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. A COSHH substance register must be reviewed regularly; updated on the (G Drive in Departments) and retained for 5 years.

- 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 suitable storage arrangements are provided for all products. Correct disposal of substances e.g. hazardous waste, clinical waste, recycling of containers, using approved/licensed waste carriers.
- All staff receive suitable and sufficient COSHH training specific to their tasks and are issued the appropriate personal protective equipment (PPE) to conduct their role.
- 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.
- The Facilities, Health and Safety Manager is notified immediately if an employee has been diagnosed with an occupational disease. A decision will then be made if this will be reported to the Health and Safety Executive (HSE) if the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) apply).

8.2. The COSHH Officer (Facilities Manager) will:

- Report to, and be accountable to, the RIT Finance, Audit and Risk Committee.
- Advise site managers and all staff across the RIT in recognising risk and advise on appropriate control measures and risk assessments.
- Monitor safe systems of work; actively reduce the chemicals used and conduct regular safety tours to highlight shortfalls in the implementation of this policy.

8.3. Employees must:

- Familiarise themselves with the relevant MSDS and COSHH risk assessments, specific procedures and assist with any implementation of 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 and immediately report any defects to their line manager.
- 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.

9. Risk assessment

9.1. COSHH Risk assessment

If the substance is 'hazardous', 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 the substance hazards; it is not a replacement for the risk assessment. In addition, the majority of by-products produced or encountered during work activities also require an assessment. This includes dust, clinical waste and fibres (e.g. fibre glass) etc. 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.

The risk assessment, at Appendix 2 must be completed by the Line Manager or competent nominated person. For the COSHH assessment to be suitable and sufficient, both parts of the form need to be completed, detailing the information gleaned from the MSDS and secondly, the activity to which the substance will be used.

Before conducting any risk assessment, careful consideration must be made to what substance is being assessed, combined with the activity to which the substance will be used. If there is an alternative to the process which negates the use of a hazardous substance, this should be implemented immediately. In all cases the use of a hazardous substance should be reduced as far as possible.

Once completed the assessment and MSDS must be communicated to all staff that could use the item or be involved in the particular process and the information should be readily available for individuals to read at any time of their daily routine. Regular reviews should be conducted to ensure the information is current and still applicable.

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. Waste disposal paperwork is to be held on file for three years for hazardous substances and be easily accessible.

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.

10. Control measures

The COSHH assessment details specific control measures to ensure the substance is used safely. It will also highlight the emergency procedures to be adopted in the event of an accident or incident. The correct use and storage of items is key to ensure all employees are safe, but more importantly, students should not have access to any substance to which they are not authorised or supervised.

PPE should be used as a last resort, but it is also very important as a control measure to prevent ill health from unnecessary contact with a substance.

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).

11. Exposure to a Hazardous Substance

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

If any member of staff 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. A specific risk assessment must be conducted for all expectant mothers to reduce any possible risk to the unborn child.

12. Training

All employees must receive suitable and sufficient training on COSHH. Equally, all new employees and relief cleaners/staff must receive an induction package and be referred to the COSHH register before they commence employment.

13. 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 all staff at all levels and should therefore be included as an integral part of the business planning process.

14. Policy Review

The content of this Policy and its effectiveness will be the subject of a two-yearly review in line with the school's Health & Safety Policy. In addition, this Policy will be the subject to review and amendment within this period should significant changes occur.

15. Responsible Officer

Facilities Manager