Control of Chemicals Policy

Ormiston Academies Trust
Control of Chemicals Policy

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<th>Policy Version Control</th>
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<td><strong>Policy type</strong></td>
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1. **Introduction and context**

Ormiston Academies Trust (OAT) 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, OAT 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.

2. **Scope**

This policy is applicable to all full-time, part-time and supply staff, pupils, contractors, volunteers and work placement students and to all OAT academies.

3. **Definitions**

3.1. **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.

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.

3.2 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.

Health checks are for employees who are regularly exposed to noise, vibrations, solvents, fumes, biological agents and hazardous substances.

3.3 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.

4. Responsibilities

4.1 Headteacher responsibilities

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

4.2 Site manager responsibilities

• Provides safe storage and disposal arrangements for hazardous substances.
• 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 Senior members of staff responsibilities

• Conduct formal assessments of the health risks to all those at the school
• Prevent and control the exposure of hazardous substances
• Ensure the proper use of controls, such as PPE, are adopted
• Ensure that the controls used are necessary, safe and regularly reviewed
• Where necessary, conduct health surveillance for staff
• Provide instruction, information and training on the use of hazardous substances.
4.4 Responsibilities of all members of staff

All members of staff will:

- Be responsible for familiarising themselves with this policy
- Use hazardous substances in accordance with the risk assessments conducted prior to use and the manufacturer’s instructions, including the required control measures
- Use PPE when necessary and report any damage to the site manager immediately
- Attend COSHH training sessions as required
- Ensure they are available for health surveillance, and report any health and safety concerns to the COSHH coordinator immediately.
- Where appropriate, communicate the COSHH procedures and control measures to pupils

5. Procedure

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.

5.1 Risk Assessment

Prior to using hazardous substances a risk assessment is conducted, taking into account the possible hazards that may occur as a result of using the substance.

In all instances, the potential risks are considered and whether the use of the hazardous substance is important to the learning experience.

The risk assessment describes the appropriate control measures that are taken when using the substance, such as using appropriate PPE.

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.

The procedures and hazards identified in the risk assessment are communicated to the members of staff.

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.

Risk assessments are also carried out for exposure to biological agents, e.g. vomit, blood, etc.

All risk assessments are reviewed on a termly basis by the headteacher and any further necessary information is added.

A COSHH assessment — how to guide is shown in Appendix 1.

A COSHH risk assessment template is shown in Appendix 2.
5.2 Control measures

The school eliminates the use of any hazardous substances unless absolutely necessary.

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.

Where substances must be used the academy will aim to substitute this for a less harmful substance in order to minimise risks.

Where the substance cannot be eliminated or substituted, the amount of time for exposure is minimised.

The amount of the substance used is reduced as much as possible.

Where possible, the substance is used in isolation, away from other areas of the school, in order to prevent exposure to others.

Appropriate ventilation is used, such as opening windows and external doors.

Appropriate personal protective equipment (PPE) is worn by all those exposed to the substance, such as gloves, safety goggles, dust masks, etc.

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.

Hazardous substances are stored safely and securely, and can be found at name of location.

All substances are safely disposed of after use by staff who are trained in COSHH.

Only staff trained in COSHH have access to hazardous substances.

Pupils are never permitted to access hazardous substances.

All substances are locked away, out of sight and reach of pupils, with only appropriate members of staff having approved access.

Control measures are adequately monitored and maintained.

Members of staff report any defect in control measures to the headteacher immediately so that replacements can be provided.

All concerns regarding COSHH are handled with the utmost importance and priority.
5.3 Health surveillance

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
- Where health surveillance is conducted, all the information on the individual’s health is recorded.

Records must be kept for a minimum of 40 years from the last entry.

The individual is able to access their health records at any time they should request it.

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.

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.

5.4 Planning for accidents, incidents and emergencies

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.

A detailed emergency plan is established prior to the use of any substance by the headteacher as part of the risk assessment.

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.

Incidents are responded to promptly, and the harmful effects are minimised where possible.

Emergency services are contacted immediately where the incident cannot be resolved by a trained member of staff.

Only members of staff trained in COSHH and first aid attempt to provide treatment to an individual.

The emergency procedures are regularly practiced as part of a ‘safety drill’ method, to ensure that all individuals at the school are aware of the steps to follow.
5.5 Training

Regular training takes place for staff to ensure 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.

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.

6. Related Documents

The Health and Safety at Work etc. Act 1974

The Control of Substances Hazardous to Health Regulations 2002 (amended 2004)

HSE (2012), ‘Working with substances hazardous to health’

This policy will be implemented in conjunction with the following OAT policies:

Health and Safety Policy

Risk Assessment Policy

Incident Reporting Policy

7. Monitoring and Review

This policy will be reviewed annually and after any changes to relevant legislation or statutory guidance.

Any changes made to this policy will be communicated to all members of staff.

Changes pertaining to pupils, e.g. their responsibilities, will be communicated to parents and pupils.
Appendix 1.

**COSHH Assessment – a how to guide**

1. Identify what COSHH items are in your department.

2. Obtain the safety data sheet for the substance from Manufacturer

3. Undertake a risk assessment (See template in Appendix 2)

4. Assess in order of priority (high risk items first).

5. Complete the assessment with the appropriate personnel involvement.

6. Make sure that the users and all staff who could be affected by the substance read the assessments and are aware of the risks and procedures.

7. Assess in the same way for newly-introduced substances

8. Assemble the substance inventory (front page), all risk assessment and safety data sheets in a folder (COSHH File). Ensure that all staff have access to the COSHH folder.

9. Review COSHH risk assessments as follows:
   - Annually
   - When there is a significant change in the work, if the substance is used for a different task
   - If the substance changes
   - Upon Health and Safety Executive (HSE) direction
   - Following any adverse event involving the task or substance

10. Monitor work process and control measures to ensure a safe system of work.

11. Monitor accident/ near-misses involving hazardous substances and sickness records.

12. Maintain Control Measures e.g. fume cupboards, local exhaust ventilations, should be maintained regularly.

13. Ensure that all relevant staff receive appropriate training.

14. Monitor control measures at least annually.
## Control of Substances Hazardous to Health Risk Assessment

<table>
<thead>
<tr>
<th>Location:</th>
<th>Area used:</th>
</tr>
</thead>
</table>

**Describe the activity or work process.**  
*Include how long and how often this is carried out and the quantity of substance used*

**Have you considered a safer alternative?**

<table>
<thead>
<tr>
<th>Work Method Description</th>
<th>Mix</th>
<th>Hand Apply</th>
<th>Spray</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work Area Description</td>
<td>Outside</td>
<td>Inside Good Ventilation</td>
<td>Inside Poor Ventilation Confined Space</td>
</tr>
</tbody>
</table>

**Identify the persons at risk:**

<table>
<thead>
<tr>
<th>Identify the persons at risk:</th>
<th>Low (&lt;1hr)</th>
<th>Medium(&lt;4hr)</th>
<th>High (&lt;8hr)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Identify the persons at risk:</th>
<th>Staff</th>
<th>Contractors</th>
<th>Pupils/Public</th>
</tr>
</thead>
</table>

**Name the substance involved in the process and its manufacturer.**  
*A copy of a current safety data sheet for this substance should be attached to this assessment*

**Are any substances restricted for use by any of the following:-**  
*IF THIS IS THE CASE, THE CHEMICAL MUST NOT BE USED*

<table>
<thead>
<tr>
<th>Are any substances restricted for use by any of the following:</th>
<th>Prohibited Materials</th>
<th>Use of Allowable Substances with Restrictions</th>
<th>Ozone Depleting Substances</th>
<th>Any other Regulations restricting, phasing out, limiting the use of certain dangerous substances (i.e. REACH)</th>
</tr>
</thead>
</table>

**Classification (state the category of danger)**

- **Very Toxic**  
- **Toxic**  
- **Corrosive**  
- **Harmful**  
- **Irritant**  
- **Health Hazard**  
- **Biological**  
- **Oxidising**  
- **Extremely Flammable**  
- **Highly Flammable**  
- **Flammable**  
- **Environmental**
<table>
<thead>
<tr>
<th>Hazard Type</th>
<th>Gas</th>
<th>Vapour</th>
<th>Mist</th>
<th>Fume</th>
<th>Dust</th>
<th>Liquid</th>
<th>Solid</th>
<th>Other</th>
<th>(State)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Route of Exposure</td>
<td>Inhalation</td>
<td>Skin</td>
<td>Eyes</td>
<td>Ingestion</td>
<td>Other</td>
<td>(State)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Workplace Exposure Limits (WELs)</td>
<td>please indicate n/a where not applicable</td>
<td></td>
<td></td>
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<tr>
<td>Long-term exposure level (8hrTWA)</td>
<td></td>
<td>Short-term exposure level (15 mins):</td>
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</tbody>
</table>

State the Risks to Health from Identified Hazards

Control Measures: (for example extraction, ventilation, training, supervision). Include special measures for vulnerable groups, such as disabled people and pregnant workers. Take account of those substances that are produced from activities undertaken by another employer's employees.

Is health surveillance or monitoring required? Yes ☐ No ☐

Personal Protective Equipment (state type and standard)

<table>
<thead>
<tr>
<th>Dust mask</th>
<th>Visor</th>
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<tbody>
<tr>
<td>☐</td>
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<table>
<thead>
<tr>
<th>Respirator</th>
<th>Goggles</th>
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<td>☐</td>
<td>☐</td>
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<table>
<thead>
<tr>
<th>Gloves</th>
<th>Overalls</th>
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<td>☐</td>
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<table>
<thead>
<tr>
<th>Footwear</th>
<th>Other</th>
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<tr>
<td>☐</td>
<td>☐</td>
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<tr>
<td>First Aid Measures</td>
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<tr>
<th>Storage</th>
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<tbody>
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<table>
<thead>
<tr>
<th>Disposal of Substances &amp; Contaminated Containers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hazardous Waste: ☐ Skip ☐ Return to Depot ☐ Return to Supplier ☐ Other ☐</td>
</tr>
<tr>
<td>(If Other Please State):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is exposure adequately controlled?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes ☐ No ☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Risk Rating Following Control Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>High ☐</td>
</tr>
<tr>
<td>Medium ☐</td>
</tr>
<tr>
<td>Low ☐</td>
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</tbody>
</table>
Appendix 3: Hazard Symbols

Explosive

Flammable

Oxidising

Corrosive

Acute toxicity
Hazardous to the environment

Some older labelling will have the 'harmful/irritant' symbol. This has been replaced by the exclamation mark pictogram:

Health hazard/Hazardous to the ozone layer

A couple of new pictograms have also been introduced:

Serious health hazard

Gas under pressure