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|  | <u>BICESTER LEARNING ACADEMY TRUST</u> <u>CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH POLICY (COSHH)</u> | | | <u>Written By:</u> R Dodsworth – Senior Operations Manager (BLA) |
| | <u>Applicable to:</u> ALL STAFF & PUPILS/STUDENTS | <u>Accountable Officers:</u> Executive Headteacher:- B J Baxter (TCS) Headteacher - I Elkington (IE) | <u>Date Adopted:</u> Autumn Term 2016 | <u>Date To Be Reviewed:</u> Autumn Term 2019 (Every 3 years) |

Bicester Learning Academy (BLA) is a Multi Academy Trust which incorporates The Cooper School (TCS) and Glory Farm Primary School (GFPS). It is a company limited by guarantee, registered in England and Wales with registered company number 09053713 and its registered address at Churchill Road, Bicester, Oxon, OX26 4RS.

1. Policy Statement

This policy has been produced in line with the Bicester Learning Academy 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 Bicester Learning Academy (BLA) is committed to protecting the health, safety, welfare and well-being of its employees and others who may be affected by the BLA's undertakings. It is essential therefore that everyone who works for or undertakes work on behalf of the BLA adheres to the requirements of this policy.

The objectives of the BLA's Control of Substances Hazardous to Health (COSHH) policy are to ensure that:

- a) The use of hazardous substances is avoided as far as is reasonably practicable;
- b) The risks to health arising from work activities involving hazardous substance 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.

2. Scope

The information, guidance and instruction within the policy cover the use of hazardous substances. The Policy is applicable to both schools within the BLA (except the Science Department, where they use department specific COSHH assessments) 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 schools meet all relevant statutory requirements regarding the general provision of the COSHH regulations.

The Policy provides a standardised approach for all persons who are responsible for work involving hazardous substances, ensuring consistency across the BLA.

3. Definitions

Hazardous Substances:

A hazardous substance is a substance with the potential to cause harm if inhaled, ingested, injected or absorbed through the skin or released into the environment.

Hazardous substances occur in the following forms from packaged items, work processes 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, mists, fibres, solids or smoke.

These substances usually indicate their basic hazard group by having a warning symbol on the label. Please see Appendix 1.

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 Safety Data Sheet (MSDS)

A Material Safety Data Sheet (MSDS) contains health and safety information written in a standard format including handling and storage, disposal considerations etc, 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

A COSHH Risk Assessment is a careful examination of hazardous substances within the workplace and evaluation of their potential to cause harm, taking into account the control measures/precautions that have been taken for their use.

Please note: 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.

Likelihood is the chance of a person being exposed to a hazard.

Severity 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 BLA register of COSHH Assessments. A full BLA register will be found in the Senior Operations Manager's office with sub-lists at the front of all COSHH folders pertaining to the chemicals in the folder for The Cooper School and Glory Farm Primary School.

Competent Nominated Person

For the purpose of this policy, this is the individual who is familiar with the tasks and the substances being used.

Personal Protective Equipment (PPE)

Personal Protective Equipment is the equipment which must be worn when handling chemicals e.g. safety glasses, safety gloves etc.

Health Surveillance

Health Surveillance is and should be used, where through the use of a chemical substance there may be potential detrimental effects on an individual in the workplace. Health Surveillance would be undertaken by the Occupational Health Service for the BLA as advised through Human Resources.

4. Roles and Responsibilities

The following specific roles and responsibilities apply to this policy and are in addition to the general roles and responsibilities placed on the Executive Headteacher/Headteacher, all line managers and employees within the BLA Health and Safety Policy.

4.1. The Members, Directors and Local Governing Board

Within the scope of this policy, the Members, Directors and Local Governing Board Members have overall responsibility for:

- Ensuring that all substances in use across the BLA are effectively and safely managed;
- Allocating sufficient resources to ensure that the BLA meets all legislative requirements for COSHH;
- Evaluation of risk; authorising the most appropriate means of risk control;
- The provision of a safe and healthy workplace for employees and visitors to the site whatever their role;
- The provision of adequate welfare facilities enabling health monitoring if appropriate;
- Proactively encouraging safe behaviours in both staff and pupils/students.

4.2. The Executive Head:

Within the scope of this policy, the Executive Head has overall responsibility for:

- Providing a recognised structure within which COSHH regulations are managed;
- Supporting and encouraging staff to manage hazardous substances safely;
- Providing adequate resources to ensure compliance with legislative requirements;
- Ensuring that safe working practices are used and reviewed to minimise risk; implementing new or changed practices where appropriate;
- Providing suitable risk assessment training for all staff;
- Ensuring correct disposal of hazardous substances;
- Ensuring that staff have access to health monitoring services;
- Encouraging staff to be proactive in protecting members of, and visitors to, the school from the effects of hazardous substances;
- Disciplining any member of the school who persistently fails to follow the agreed procedure.

4.3. Application of the BLA COSHH Policy across The Cooper School and Glory Farm Primary School

- The quantity of cleaning products and/or hazardous substances are fewer at Glory Farm Primary School than for The Cooper School, nonetheless the BLA COSHH policy applies equally across both Secondary and Primary School.
- The Cleaning Supervisor will be responsible for ensuring that the duties outlined in section are followed for the BLA cleaning teams.
- All teachers within the primary school are to be responsible for the use of hazardous substances within their classroom and are to refer to section 4.5 of this document.

4.4. Heads of Department and Cleaning Supervisor

Within the scope of this policy, Heads of Department at The Cooper School and the Cleaning Supervisor for the BLA are responsible for:

- Maintaining a COSHH Register of substances used within their department or area of responsibility;
- Introducing new substances only after receipt of a Material Safety Data Sheet, a full Risk Assessment, a safe working procedure and staff training;
- Ensuring that all members of their department or cleaning team comply with current health and safety legislation;
- Providing approved storage facilities for hazardous substances specific to their departments or cleaning team;
- Ensuring that all substances are properly labelled;
- Implementing, monitoring and reviewing procedures designed to minimise risk from hazardous substances within their department or cleaning team;
- Inspecting departmental or cleaning storage areas regularly to ensure that the only substances available are those in regular use;
- Disposing of substances not in use regularly and in a safe manner in conjunction with the Senior Operations Manager and Estate Supervisor if significantly hazardous;
- Implementing and following whole school health and safety procedures; reporting when those procedures are inadequate;
- Instructing their staff and pupils/students in safe working procedures;
- Disciplining any member of the school who persistently fails to follow the agreed procedures;
- Taking all reasonable and practical steps to prevent unauthorised or improper use of substances;
- Reporting instances of ill health amongst their staff or pupils/students that may be attributable to substances in use in their department;
- Ensuring that adequate personal protective equipment where other control measures cannot be used appropriate for the substances in use is available for all users within their department; storing and inspecting the equipment before and after use;

- Providing a copy of assessments to be kept by the Estate Supervisor;
- Auditing substances and their storage to ensure compliance with legislation;
- Having awareness of dangerous substance symbols and abbreviations and of risk and safety phrases (reference EH40).

4.5. All Members of Staff:

Within the scope of this policy, all members of staff are responsible for:

- Familiarising themselves with the substances used within the school, the COSHH register, and safe working procedures;
- Ensuring that all health and safety regulations and safe working procedures for handling substances are followed by both staff and pupils/students;
- Only using new substances after the risk assessment and safe working procedures have been agreed;
- Ensuring that substances are properly labelled;
- Informing the Head of Department or respective line manager when substances are no longer needed and require disposal;
- Instructing pupils/students in safe working procedures for handling substances; disciplining pupils/students who persistently fail to follow those procedures;
- Ensuring that their personal protective equipment is used correctly and appropriately;
- Ensuring that pupils/students do not misuse or abuse personal protective equipment provided for their protection;
- Taking reasonable care for their own health and safety and for that of any other persons who may be affected by their acts or omissions at work; avoiding conduct that would put themselves or anyone else at risk;
- Cooperating with their employer and their delegated representatives to enable full compliance with current health and safety legislation;
- Reporting any symptoms of ill health that may be attributable to substances in their work environment to their line manager;
- Reporting unsafe conditions, damaged or defective plant, equipment or other facility to the Estate Supervisor.

4.6. Senior Operations Manager

The Senior Operations Manager is responsible for ensuring that the COSHH Policy is implemented across the BLA.

4.7. Estate Supervisor

Within the scope of this policy, The Estate Supervisor is responsible for:

- Maintaining the central COSHH register for inspection by the relevant authorities in conjunction with the heads of departments at The Cooper School and on behalf of Glory Farm Primary School;
- Arranging appropriate storage facilities for substances if require;
- Ensuring correct disposal of all substances; this will include daily waste as well as 'specialist' items;
- Ensuring that all members of the BLA and contractors comply with COSHH Regulations 2005;
- Implementing such technical and physical control measures as directed by the Executive Headteacher/Headteacher;
- Acting as liaison for the annual LEV inspections; implementing remedial works as highlighted and following agreement with the Senior Operations Manager;

- Highlighting disposal issues for articles which may contain hazardous substances such as refrigerators;
- Seeking assistance for problems that arise with substances not part of the COSHH regulations e.g. asbestos and lead;
- Seeking assistance from specialist authorities when it is suspected that workplace exposure limits (WELs) may be exceeded.

5. Organisation and Arrangements

5.1. Identification and Use of Hazardous Substances

The Executive Headteacher/Headteacher and Line Manager must identify whether a hazardous substance is being used/generated as part of the process/or produced as waste. The Material Safety Data Sheet (MSDS) will inform whether it is a hazardous substance.

Before work commences, the person with overall control for the activity must first avoid 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.

5.2. COSHH Risk Assessment

5.2.1. COSHH Risk Assessment

For every substance, the BLA uses, there must be a MSDS in place.

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 knowledge and methods of use of the substance in their area, including hazardous products, by-products or waste.

If Human Resources is advised that a member of staff is pregnant or has 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, or member of staff with a medical condition, may be at risk.

5.2.2. 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 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 of 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 and training;
- Supervision;

- Personal Protective Equipment.

Control measures must take into account the action required in the event of an emergency.

A flow chart will be added to the site specific COSHH folder.

5.2.3. Competence

The COSHH risk assessment must be undertaken by a Line Manager or competent nominated person, together with someone who is familiar with the work being assessed.

5.2.4. COSHH Risk Assessment Form

Please see Appendix 3.

5.2.5. Communication, Information, Instruction and 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 held with the products so that in the event of an incident, the correct emergency action or first aid measures can be taken. The BLA must inform employees about the hazards/risks associated with the use of that substance. In addition to this, employees must be made aware of the control measures that have been identified via the risk assessment and that they must be complied with. The BLA must give employees the necessary instruction and training to enable them to follow/implement the required controls.

5.2.6. 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 they are still valid and up-to-date;
- when there has been a change in work procedures;
- if the 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. MSDS data sheets are to be renewed on a five yearly basis.

If a COSHH assessment identifies that health surveillance is required, then it will be undertaken by the BLA's Occupational Health provider. The health records are to be kept for 40 years.

5. Monitoring and 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.

6. Review

The content of this Policy and its effectiveness will be reviewed on a three-yearly cycle. In addition, this Policy will be the subject of review and amendment within this period should significant changes occur.

The BLA will store all COSHH forms and MDSS's electronically.

7. Further Reference






- BLA Health and Safety Policy.
- GHS. <http://www.hse.gov.uk/chemical-classification/legal/clp-regulation.htm>
- HSE. <http://www.hse.gov.uk/coshh/basics.htm>
- HSE. <http://www.hse.gov.uk/coshh/detail/coshh-clp-reach.htm>
- HSE, Control of Substances Hazardous to Health 2002 (as amended), Approved Code of Practice, L5.
- HSE, Working with substances hazardous to health; What you need to know about COSHH (INDG 136 rev 4).



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| Policy/Procedure Title | Control of Substances Hazardous to Health Policy (COSHH) |
| Issue Date to Committee | Autumn Term 2016 |
| Author (Name/Department) | R Dodsworth – Senior Operations Manager (BLA) |
| Approved by Directors | Autumn Term 2016 |
| Review Date – Every year 3 years | Autumn Term 2019 |

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Appendix 1: EU hazard symbols and their meaning

The table below illustrates the seven EU hazard symbols and their meanings. Two of the symbols are used to denote more than one hazard with the actual chemical hazard being listed on the label/container/MSDS. The symbols are black on an orange square background. These symbols are being phased out and will no longer be used by 2015.

| Symbol | Abbreviation | Hazard(s) the symbol is used to indicate |
|---|---|---|
|  | T+ T Carc Cat 1 & 2 Muta Cat 1 & 2 Repr Cat 1 & 2 | Very Toxic Toxic May cause or increase incidence of cancer Induce of increase the incidence of non-heritable effects in offspring and/or impair reproductive capacity. |
|  | N | Dangerous for the Environment. |
|  | | Bio-Hazard |
|  | F+ F | Extremely flammable Highly Flammable/Flammable |
|  | Xn | Harmful (may cause damage to health) Irritant Category 3 Carcinogens, Mutagens and Reproductive Toxins – suspected as such but insufficient evidence to meet a higher category. |







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|  | | O | Oxidising |
|  | | C | Corrosive |


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Appendix 2: Globally harmonised system for the classification and labelling of chemicals

The Globally Harmonised System of Classification and labelling of chemicals regulations (GHS) is a UN treaty which aims to standardise hazard labelling and Material Safety Data Sheets. In the European Union, GHS is being implemented through the Classification, Labelling and Packaging of Substances and Mixtures (CLP) Regulations.

By 2015, the old EU orange symbols and classifications will no longer be used, except for biohazards and radioactive hazards, which are not covered by GHS due to the nature of the hazards involved. The labelling for these remains largely unchanged. Until 2015, both sets of symbols will be in use. The following is a basic summary of what the symbols mean:

| Symbol | Hazard(s) the symbol is used to indicate |
|---|--|
|  | Fatal or Toxic when inhaled, swallowed or on contact with skin. |
|  | Indicates more serious, long term health hazards like: Known to cause or suspected of causing cancer. May cause allergy or asthma symptoms if inhaled. Known to cause or suspected of causing genetic defects May cause or suspected of causing damage to unborn child. Known to or suspected of causing damage to organs. Fatal or harmful if swallowed and enters lungs on vomiting. |
|  | Very toxic to aquatic life with or without long lasting effects. |
|  | Extremely flammable, highly flammable and flammable gases, vapours, aerosol, liquids and solid. Substances that might catch fire on heating or when exposed to certain substance or conditions. |
|  | Oxidising – such substances tend to be very reactive and release oxygen which may support/intensify fires or even cause explosions or fires. |
|  | Gas under pressure (compressed gas) Covers hazards such as exploding if heated or cold hazard if gas is released |

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|  | Substances that can explode under certain conditions, such as when ignited, or heated, or in contact with certain other chemicals. |
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Please Note:



Appendix 1. Material Safety Data Sheets refer to 'R' Phrases and 'S' Phrases. R Phrases are Risk Phrases which specify the particular dangers associated with the use of the chemical. S Phrases denote the appropriate safety precautions or personal protective equipment required to minimise risk.

Appendix 2. P statements and H statements are replacing the R Phrases and S Phrases under GHS. A 'P' statement is a Precautionary statement which provides standardised precaution wording and an 'H' statement is a Physical Hazard Statement which produces standardised precaution wording to indicate the hazards of a product including, when appropriate, the degree of the hazard. Information on these statements can be found at: www.hse.gov.uk/coshh/

Information on P statements and H statement will be added to the site specific COSHH folders.

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Appendix 3: New BLA COSHH Template (To be used from 1st September, 2015)

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|  | This information sheet links to Risk Assessment Reference Number: | NAME OF PRODUCT/SUBSTANCE: . |
| | | MANUFACTURER'S NAME: |
| USE/EXPOSURE (DETAILS OF THE WAY IT IS USED): | DATE OF MSDS SHEET: | |
| | LOCATION OF MSDS SHEET: . | |
| IS THE HAZARDOUS SUBSTANCE GENERATED AS A RESULT OF A PROCESS? YES/NO | HAZARD WARNING SYMBOL ON CONTAINER LABEL: (circle)  | |
| Workplace Exposure Limit (WEL): | | |
| POTENTIAL HARM OR ILL EFFECTS: (state what harm may occur) | ACTION TO BE TAKEN IN CASE OF EMERGENCY: | |
| | FIRST AID ARRANGEMENTS: . | |
| | SPILLAGE RELEASE ACTION: | |
| | MANAGEMENT (contact in case of emergency): Name: Telephone No: | |
| WORK METHOD: (including precautions and controls to be implemented) | | |
| Name of Assessor: Date of Review: | Position: | |
| Next Review: | Next Review: | |
| Next Review: | Next Review: | |

Appendix 4: 'P' Statements and 'H' statements.

Please find reference to information on the new classification of 'P' and 'H' statements please refer to the following link: <http://www.hse.gov.uk/chemical-classification/labelling-packaging/hazard-precautionary-statements-signal-words.htm>.

More information will be found with on the Material Safety Data Sheets.