

The Lotus Academy Trust



Supporting children to find opportunities in every difficulty

The Damara School



Specialist SEMH Independent School

Control of Substances Hazardous to Health (COSHH) Policy

Approved by: Trust Board

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Next review due by: January 2027

1. Policy Statement

This Policy has been produced in accordance with The Damara 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 School is committed to protecting the health, safety, welfare and wellbeing of its employees, pupils, visitors, contractors 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 reasonably 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 assessments and controls are monitored and adequately reviewed.
- e) employees, pupils and others are provided with appropriate information, instruction and training.
- f) all relevant statutory requirements and, where reasonably practicable, best practice guidance is adhered to.
- g) the school complies with the Control of Substances Hazardous to Health Regulations 2002 (as amended).

2. 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, including classrooms, science laboratories, design and technology areas, art rooms, cleaning operations, maintenance activities, grounds maintenance and any other area where hazardous substances may be used or stored.

It is essential 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.

This policy applies to:

- All employees (teaching and non-teaching staff)
- Contractors working on school premises
- Visitors who may use or be exposed to hazardous substances
- Pupils who may use hazardous substances as part of their learning activities

3. 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, pesticides, art materials, science chemicals and maintenance products can be hazardous and/or harmful to 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, mist, fibres, solids or smoke.

These substances usually indicate their basic hazard group by having a warning symbol on the label. The current symbols are listed in 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
- Materials hazardous due to flammability only (these fall under Dangerous Substances and Explosive Atmosphere Regulations (DSEAR))
- Substances used for medical treatment

Safety Data Sheet (SDS) - formerly 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 SDS will tell you if the substance is classified as a hazardous

substance. **Note:** The term "Safety Data Sheet" (SDS) has replaced "Material Safety Data Sheet" (MSDS) under current regulations, though both terms refer to the same document.

COSHH Risk Assessment

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

Anything that has the potential to cause harm.

Risk

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 or a 15-minute reference period for short-term exposure limits.

COSHH Risk Assessment Register

This is our COSHH folder/electronic database containing COSHH assessments and their inventory. The register is maintained by the Deputy head and is available for inspection.

Competent nominated person

For the purpose of this Policy, this is an individual who has received appropriate training and is familiar with the task and substances being used. They must have sufficient knowledge, experience and training to undertake COSHH risk assessments.

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 may be undertaken by occupational health professionals, appropriately trained staff, or external providers as appropriate to the level of risk.

4. 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 Deputy head teacher, all line managers and employees within The Damara School's Health and Safety Policy.

4.1 The Trust Board must ensure that:

- Adequate resources are allocated to implement this policy effectively
- The policy is reviewed at least every three years or sooner if there are significant changes
- COSHH compliance is monitored through regular reports from the Deputy head

4.2 The Deputy head and line managers must ensure that:

- The use of hazardous substances is avoided wherever possible. If this is not reasonably practicable then a COSHH assessment must be undertaken before the substance is used.
- Safer alternative products are used, where reasonably practicable, following the principle of substitution.
- Hazardous substances that are being used, or produced as part of the work process or produced as waste are identified and recorded.
- A copy of the Safety Data Sheet (SDS) is obtained for all products that are used. This must be a requirement of local purchasing procedures because SDSs must be available for all hazardous products that are used/stored.
- COSHH risk assessments for hazardous substances are undertaken and recorded using the school's COSHH assessment form. The completion of the assessment can be delegated to a competent nominated person; however, the manager responsible for the activity must review, 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, including:
 - Secure storage away from unauthorised access (particularly important in an SEMH setting)
 - Appropriate temperature control
 - Segregation of incompatible substances
 - Adequate ventilation
 - Secondary containment where appropriate (e.g. bunded storage)
- Substances are stored and labelled correctly in accordance with manufacturer instructions and current regulations.
- Appropriate hazard signs are provided on all storage areas/cupboards where a risk has been identified.
- Correct disposal of substances is arranged, e.g. hazardous waste, clinical waste, recycling of containers, using approved/licensed waste carriers.
- Appropriate personal protective equipment (PPE) is purchased, issued, maintained and replaced where necessary. PPE must be suitable for the task and the individual.
- All staff receive adequate and appropriate COSHH training, instruction and information, specific to their tasks. This training must be:
 - Provided at induction
 - Refreshed regularly (at least annually)
 - Recorded
 - Task-specific
- A COSHH risk assessment register exists, is kept up to date and is reviewed regularly.
- Any localised extraction systems or engineering controls are regularly inspected, examined, tested and maintained in compliance with statutory requirements (typically annually for Local Exhaust Ventilation systems).
- Health surveillance (as identified through the COSHH risk assessment process) is undertaken where required. These records must be kept for 40 years from the date of the last entry.
- Suitable arrangements are in place to deal with accidents and emergencies involving hazardous substances (e.g. spills), including:
 - Spill kits in appropriate locations
 - Emergency procedures clearly displayed
 - Staff trained in emergency response
 - First aid arrangements
 - Emergency contact numbers
- 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. Other appropriate persons are notified 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 guidance 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:
 - At least annually
 - When there is a change in the substance, process, or working conditions
 - Following any incident or near miss
 - When new information about the substance becomes available
- COSHH assessments are retained for at least 5 years after they cease to be current.
- The Health and Safety Officer is notified immediately if an employee has been diagnosed with an occupational disease or work-related ill health condition.
- Waste disposal paperwork is held on file for three years for hazardous substances and is easily accessible.
- Any occupational disease or work-related ill health is reported to the Health and Safety Executive (HSE) under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) where applicable.
- **Specific considerations for SEMH pupils:**
 - Additional risk assessments are completed where pupils with SEMH needs may be at increased risk
 - Secure storage is maintained to prevent unauthorised access
 - Supervision levels are appropriate to the needs of the pupils
 - Pupils receive age-appropriate and needs-appropriate instruction about hazardous substances

4.3 Employees must:

- Familiarise themselves with the relevant COSHH risk assessments, activity risk assessments, procedures and safe systems of work before using any hazardous substance.
- Use hazardous substances only in accordance with the manufacturer's instructions and COSHH risk assessments (for non-hazardous substances, follow 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, headaches, dizziness.
- Use all control measures (i.e. ventilation, PPE, safe working procedures) 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 their 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 personal hygiene, including washing hands after handling substances and before eating, drinking or smoking.
- Never decant substances into unlabelled containers.
- Ensure substances are stored securely after use.

- Report any spillages, incidents or near misses immediately.
- Report any other health and safety concern to the Deputy head immediately.
- Set a good example to pupils in the safe handling and use of substances.

4.4 The COSHH Co-ordinator will:

- Maintain the COSHH risk assessment register
- Ensure Safety Data Sheets are obtained and filed appropriately
- Co-ordinate COSHH training for staff
- Carry out COSHH audits at the school on a scheduled basis (at least annually)
- Report findings to the Deputy head
- Keep up to date with changes in COSHH regulations and best practice

4.5 Contractors must:

- Provide their own COSHH risk assessments for any hazardous substances they bring onto school premises
- Ensure their staff are trained in the safe use of substances
- Comply with the school's health and safety requirements
- Inform the school of any substances they will be using and any associated risks
- Ensure substances are stored securely and removed from site when work is complete

5. Organisation & Arrangements

5.1 Identification and use of hazardous substances

The Deputy head (or nominated person) must identify whether a hazardous substance is being used/generated as part of a process/or produced as waste. The Safety Data Sheet (SDS) will inform whether it is a hazardous substance.

Before work commences, the person with overall control for the activity must:

1. First, consider whether the use of hazardous substances can be avoided entirely
2. If this is not reasonably practicable, consider whether a less hazardous alternative can be used (substitution)
3. If a hazardous substance must be used, ensure a COSHH assessment is completed before use
4. Ensure that a SDS has been obtained and is readily available
5. Ensure appropriate control measures are in place
6. Ensure all persons who will use the substance are trained and competent

Common hazardous substances in schools include:

- Cleaning products (bleach, disinfectants, degreasers)
- Science chemicals

- Art materials (solvents, fixatives, glazes)
- Design and technology materials (adhesives, resins, wood treatments)
- Maintenance products (paints, varnishes, oils)
- Grounds maintenance products (pesticides, herbicides, fertilisers)
- Swimming pool chemicals (if applicable)
- Biological hazards (body fluids, waste)

5.2 Risk assessment

5.2.1 COSHH Risk assessment

For every substance the School uses, we must have the Safety Data Sheet (SDS) for it.

If the substance is 'hazardous', then a COSHH risk assessment is required. The SDS informs staff about whether or not the substance is hazardous, and therefore whether it requires a COSHH assessment. The SDS will give information about substance hazards; it is not a replacement for the risk assessment.

The COSHH risk assessment must consider:

- The hazardous properties of the substance
- Information provided by the supplier (SDS)
- The work processes and practices which might result in exposure
- Who might be exposed and to what extent (including pupils, staff, contractors, visitors)
- The likelihood of exposure occurring
- The measures needed to comply with COSHH regulations
- The results of any monitoring or health surveillance
- Any specific groups who may be at particular risk, including:
 - Pregnant workers and new mothers
 - Young workers (under 18)
 - Workers with disabilities or health conditions
 - Pupils with SEMH needs who may be more vulnerable

If the Deputy head is advised that staff are pregnant, breastfeeding, or have a medical condition whereby they may be affected by hazardous substances, a specific risk assessment must be completed and advice on using substances must be sought. The risk assessment must consider that the mother or unborn child may be at risk. Similar considerations must be made for workers who are breastfeeding.

The COSHH risk assessment process involves:

1. **Gathering information** about the substance (from the SDS), the work activity, and who might be exposed
2. **Evaluating the risks** - considering the likelihood and severity of harm
3. **Identifying control measures** to eliminate or reduce the risk
4. **Recording the findings** on the COSHH assessment form

5. **Implementing the control measures** and ensuring they are used
6. **Monitoring and reviewing** the assessment regularly

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 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:

1. **Elimination** - Eliminate the use of a harmful substance entirely. This is the most effective control measure.
 - a. *Example: Use microfibre cloths and water instead of chemical cleaners where possible*
2. **Substitution** - Replace the hazardous substance with a less hazardous alternative.
 - a. *Example: Use a paste rather than powder form to reduce inhalation risk; use water-based paints instead of solvent-based*
3. **Reduction** - Reduce the amount used or the time spent using the substance
 - a. *Example: Use concentrated products in smaller quantities; limit the duration of exposure*
4. **Isolation/Enclosure** - Separate people from the hazard
 - a. *Example: Use a fume cupboard for science experiments; restrict access to areas where substances are being used*
5. **Engineering controls** - Local Exhaust Ventilation (LEV) / General ventilation
 - a. *Example: Use extraction systems; ensure adequate natural ventilation through doors/windows*
6. **Safe systems of work** - Develop and implement procedures to minimise exposure
 - a. *Example: Written procedures for mixing chemicals; clear protocols for cleaning up spills*
7. **Information, instruction, training** - Ensure all users understand the risks and how to work safely
 - a. *Example: Induction training; refresher training; clear instructions displayed*
8. **Supervision** - Provide appropriate levels of supervision, particularly for less experienced staff or pupils
 - a. *Example: Direct supervision of pupils using art materials; monitoring of cleaning staff*
9. **Personal protective equipment (PPE)** - This is the last resort and should only be used when other controls are not sufficient
 - a. *Example: Gloves, goggles, aprons, respirators*
 - b. PPE must be:
 - i. Suitable for the task and the individual
 - ii. Properly fitted
 - iii. Maintained in good condition
 - iv. Stored correctly

- v. Replaced when damaged or worn

Control measures must take into account the action required in the event of an emergency, including:

- Spill procedures
- First aid measures
- Emergency contacts
- Evacuation procedures (if necessary)

Multiple control measures may be needed to adequately control the risk. For example, when using cleaning chemicals, you might:

- Substitute for a less hazardous product (substitution)
- Use the minimum amount necessary (reduction)
- Ensure good ventilation (engineering control)
- Provide training (information and instruction)
- Provide gloves (PPE)

5.2.3 Competence

The COSHH risk assessment must be undertaken by the Deputy head or a competent nominated person together with someone who is familiar with the systems of work within the area being assessed.

A competent person must have:

- Sufficient training and knowledge of COSHH principles
- Understanding of the work processes involved
- Ability to identify hazards and assess risks
- Knowledge of appropriate control measures
- Authority to implement changes

Competence can be demonstrated through:

- Formal COSHH training
- Experience in conducting risk assessments
- Understanding of the specific work activities and substances involved
- Access to appropriate resources and guidance

The school will ensure that staff undertaking COSHH assessments receive appropriate training and support.

5.2.4 COSHH risk assessment form

The school uses a standardised COSHH risk assessment form (see Appendix 3) which must be used for all COSHH assessments.

The form includes:

- Details of the substance (name, supplier, SDS reference)
- Where and how the substance is used

- Who might be exposed (staff, pupils, contractors, visitors)
- The hazards presented by the substance
- The risks and their severity
- Control measures in place
- Additional controls needed
- Emergency procedures
- PPE requirements
- Health surveillance requirements (if any)
- Review date
- Assessor details and sign-off

Completed assessments must be:

- Signed by the person who completed the assessment
- Approved by the Deputy head or line manager
- Made available to all relevant staff
- Stored in the COSHH register
- Reviewed regularly

5.2.5 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 held with the products so that in the event of an incident, the correct emergency action or first aid measures can be taken.

The school will ensure that:

- All staff who use or may be exposed to hazardous substances receive appropriate information, instruction and training
- Training is provided at induction and refreshed regularly (at least annually)
- Training is specific to the substances and tasks involved
- Training covers:
 - The hazards and risks associated with the substances they use
 - The control measures that must be followed
 - How to use control measures correctly (including PPE)
 - Emergency procedures
 - How to report concerns or incidents
 - Storage and disposal requirements

Information must be provided about:

- The hazards/risks associated with the use of each substance
- The control measures that have been identified via the risk assessment and that they must be complied with
- The results of any monitoring or health surveillance
- Emergency procedures and first aid measures

Methods of communication include:

- Staff meetings and briefings

- Written procedures and risk assessments
- Safety signs and labels
- Training sessions
- Induction programmes
- Safety bulletins and updates

Training records must be kept showing:

- Who has been trained
- What training was provided
- When training took place
- Who delivered the training
- When refresher training is due

For pupils, age-appropriate information and instruction must be provided when they use hazardous substances, for example in science, art or design and technology lessons. This should be integrated into lesson planning and delivery.

5.2.6 COSHH Assessment record and review

All COSHH assessments must be recorded using 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** or working practices
- **If the substance is used for a different task** or in a different way
- **If a substance has changed**, e.g. new SDS received, different formulation, different supplier
- **Following any adverse incident** involving the substance or task, including near misses
- **If there are changes to the people exposed**, e.g. a pregnant worker, a worker with a health condition
- **If monitoring or health surveillance indicates that controls are not effective**
- **Upon HSE direction** or following an inspection
- **If new information becomes available** about the hazards of the substance

COSHH Risk Assessments must be:

- Kept for a minimum of five years after they cease to be current
- Available for inspection as part of annual inspections and audits
- Stored securely but accessible to those who need them
- Included in the COSHH register

If COSHH risk assessments are used as material evidence in a personal injury adverse event (e.g. a claim for work-related ill health), then a copy of the risk assessment should be placed with the employee's medical records for future reference and retained in accordance with legal requirements.

If a COSHH assessment identifies that health surveillance is required, then it will be arranged through Occupational Health or an appropriate healthcare provider. These health records must be kept for 40 years from the date of the last entry, as they may be needed to:

- Monitor the effectiveness of control measures
- Detect early signs of work-related ill health
- Provide evidence in case of future health claims
- Comply with legal requirements

The COSHH register must be maintained and kept up to date. It should include:

- A list of all hazardous substances used in the school
- Location of each substance
- The COSHH assessment reference
- Review dates
- Who is responsible for each assessment

5.3 Storage of hazardous substances

All hazardous substances must be stored safely and securely to prevent unauthorised access and to minimise risks.

Storage requirements include:

- **Secure storage** - All hazardous substances must be kept in locked cupboards or storage areas. This is particularly important in an SEMH setting where pupils may be at increased risk of accessing substances inappropriately.
- **Appropriate containers** - Substances must be kept in their original containers with original labels intact. If decanting is necessary (which should be avoided where possible), the new container must be clearly labelled with:
 - The name of the substance
 - The hazard symbols
 - Basic safety information
 - Date of decanting
- **Segregation** - Incompatible substances must be stored separately to prevent dangerous reactions. For example:
 - Acids and alkalis should be stored separately
 - Oxidising agents should be kept away from flammable materials
 - Refer to the SDS for specific storage requirements
- **Ventilation** - Storage areas must be adequately ventilated to prevent build-up of fumes or vapours
- **Temperature control** - Some substances require storage at specific temperatures. Follow manufacturer's instructions.
- **Secondary containment** - Where there is a risk of spillage, substances should be stored in bunded containers or on spill trays
- **Clear labelling** - Storage areas must be clearly labelled with appropriate hazard signs

- **Access control** - Only authorised persons should have access to storage areas. Keys must be controlled and a record kept of who has access.
- **Stock control** - Regular checks should be made to:
 - Ensure substances are in good condition
 - Remove out-of-date products
 - Maintain appropriate stock levels (avoid over-stocking)
 - Check for leaks or damage
- **Location** - Storage areas should be:
 - Away from main thoroughfares
 - Away from heat sources
 - Not in direct sunlight
 - Not in areas accessible to pupils
 - Clearly signed

Specific considerations for SEMH settings:

- Enhanced security measures may be needed
- Risk assessments should consider the possibility of deliberate misuse
- Regular monitoring of storage areas
- Clear protocols for issuing and returning substances

5.4 Use of hazardous substances

Before using any hazardous substance, staff must:

1. Read and understand the COSHH risk assessment
2. Check they have received appropriate training
3. Ensure all necessary control measures are in place
4. Check the substance is in good condition and properly labelled
5. Ensure appropriate PPE is available and in good condition
6. Know the emergency procedures

During use:

- Follow the safe system of work identified in the COSHH assessment
- Use the minimum amount necessary
- Ensure adequate ventilation
- Use control measures correctly (e.g. extraction, PPE)
- Never eat, drink or smoke while using hazardous substances
- Keep substances away from pupils unless they are directly supervised
- Never leave substances unattended
- Ensure pupils using substances are appropriately supervised and have received suitable instruction

After use:

- Store substances securely immediately after use
- Clean equipment and work areas
- Dispose of waste appropriately

- Wash hands thoroughly
- Remove and store PPE correctly
- Report any problems or concerns

5.5 Disposal of hazardous substances

All hazardous waste must be disposed of safely and in accordance with environmental regulations.

The school will ensure that:

- Hazardous waste is not disposed of via normal waste streams
- Appropriate waste containers are provided
- Waste is clearly labelled
- Waste is stored securely until collection
- Only licensed waste carriers are used for disposal of hazardous waste
- Waste transfer notes are obtained and retained for three years
- Staff are trained in correct disposal procedures
- Specific disposal requirements in the SDS are followed

Common types of hazardous waste in schools include:

- Used cleaning chemicals
- Science chemicals
- Art materials (solvents, paints)
- Fluorescent tubes and energy-saving bulbs
- Batteries
- Electronic equipment
- Clinical waste (if applicable)

Environmental considerations:

- The school is committed to minimising environmental impact
- Substances should be used efficiently to minimise waste
- Recycling should be used where possible (e.g. containers)
- Consideration should be given to environmental impact when selecting products

5.6 Monitoring and health surveillance

Monitoring of exposure may be required where:

- There is uncertainty about the effectiveness of control measures
- Workplace Exposure Limits (WELs) may be exceeded
- The COSHH assessment identifies a need for monitoring

Monitoring may involve:

- Air sampling to measure concentrations of substances

- Surface sampling to check for contamination
- Biological monitoring (testing of workers)

Health surveillance is required where:

- The COSHH assessment identifies a risk to health
- There is a reasonable likelihood that disease or ill health may occur
- There are valid techniques for detecting early signs of disease
- Health surveillance is likely to benefit the employee

Health surveillance may include:

- Health questionnaires
- Skin inspections
- Lung function tests
- Blood tests
- Medical examinations

The school will:

- Arrange health surveillance where the COSHH assessment identifies it is needed
- Use competent occupational health providers
- Keep health records confidential and secure
- Retain health surveillance records for 40 years
- Act on the results of health surveillance, including reviewing control measures if necessary
- Inform employees of the results of their health surveillance

5.7 Accidents, incidents and emergencies

Emergency procedures must be in place for:

- Spills and leaks
- Exposure (skin contact, eye contact, inhalation, ingestion)
- Fire involving hazardous substances
- Other emergencies

Spill procedures:

- Small spills should be dealt with immediately by trained staff using appropriate spill kits
- Large spills may require evacuation and specialist clean-up
- All spills must be reported
- Spill kits must be available in areas where hazardous substances are used
- Staff must be trained in spill procedures

Exposure procedures:

The SDS provides specific first aid measures for each substance. General principles include:

- **Skin contact:** Remove contaminated clothing, wash affected area with plenty of water

- **Eye contact:** Rinse immediately with plenty of water for at least 15 minutes, seek medical attention
- **Inhalation:** Move to fresh air, seek medical attention if symptoms persist
- **Ingestion:** Do not induce vomiting unless advised, seek immediate medical attention

All accidents and incidents involving hazardous substances must be:

- Reported immediately to the Deputy head
- Recorded in the accident book
- Investigated to identify causes and prevent recurrence
- Reported to HSE under RIDDOR if required
- Used to review and update COSHH assessments

Emergency contact numbers must be clearly displayed, including:

- Emergency services (999)
- NHS 111
- Poison information services
- School first aiders
- Site manager/caretaker

6. Monitoring & Review

6.1 Policy review

The content of this Policy and its effectiveness will be the subject of review:

- **At least every three years** in conformity with the school's Health & Safety Policy
- **Sooner if there are significant changes** to:
 - Legislation or guidance
 - School operations or structure
 - Following serious incidents
 - As a result of audit findings

The review will consider:

- Whether the policy remains fit for purpose
- Compliance with current legislation and best practice
- Effectiveness of implementation
- Training needs
- Resources required
- Incident and accident data
- Audit findings

Previous versions of the policy will be archived in accordance with the school's document retention policy.

6.2 Monitoring arrangements

The school will monitor COSHH compliance through:

Annual audits including:

- Review of the COSHH register
- Inspection of storage areas
- Checks that assessments are up to date
- Review of training records
- Inspection of control measures (e.g. PPE, ventilation systems)
- Review of incident and accident data

Regular inspections by:

- Deputy head
- Health and Safety Officer
- COSHH Co-ordinator
- Department heads

- **Performance indicators** will include:

- Number of COSHH assessments completed and up to date
- Percentage of staff trained in COSHH
- Number of incidents/accidents involving hazardous substances
- Number of reported work-related health symptoms
- Compliance rates from audits
- Timeliness of assessment reviews
- **Reporting arrangements:**
- The Deputy head will provide an annual report to the Trust Board on COSHH compliance
- Significant incidents or concerns will be reported immediately
- Audit findings will be reported with action plans for improvement
- **Action on findings:**
- Any non-compliance identified through monitoring will be addressed promptly
- Action plans will be developed to address deficiencies
- Progress will be tracked and reported
- Lessons learned will be shared across the school

6.3 Audit and inspection

- **Annual COSHH audits will include:**

- **Documentation review:**

- COSHH register is complete and up to date
- All substances have current Safety Data Sheets

- All hazardous substances have COSHH assessments
- Assessments are within their review date
- Training records are complete and current
- **Physical inspection:**
 - Storage areas are secure and appropriate
 - Substances are correctly labelled
 - Control measures are in place and functioning (e.g. ventilation, PPE)
 - Spill kits are available and in date
 - Emergency procedures are displayed
 - Hazard signs are present where required
- **Compliance checks:**
 - Staff are following safe systems of work
 - PPE is being used correctly
 - Supervision arrangements are adequate
 - Waste disposal arrangements are appropriate
- **Consultation:**
 - Staff feedback on COSHH arrangements
 - Review of any concerns raised
 - Identification of training needs
- **Audit findings will be:**
 - Documented in a written report
 - Shared with relevant staff and the Trust Board
 - Used to develop action plans
 - Followed up to ensure actions are completed
- **External inspections:** The school will co-operate fully with any external inspections by:
 - HSE inspectors
 - Local authority health and safety advisors
 - Insurance company inspectors
 - Ofsted inspectors
 - Independent health and safety consultants
-

7. Further Reference & Associated Documents

This COSHH Policy should be read in conjunction with the following school policies and documents:

School policies:

- Health and Safety Policy
- Risk Assessment Policy
- First Aid Policy
- Accident and Incident Reporting Policy
- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- Science Department Safety Policy (if applicable)
- Design and Technology Safety Policy (if applicable)

- Art Department Safety Policy (if applicable)

External guidance and legislation:

- Control of Substances Hazardous to Health Regulations 2002 (as amended)
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Personal Protective Equipment at Work Regulations 1992
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- HSE guidance on COSHH (available at www.hse.gov.uk/coshh)
- CLEAPSS guidance (for schools using science and technology equipment)
- Data Protection Act 2018 and UK GDPR (for health surveillance records)

School-specific documents:

- Asbestos Management Plan
- COSHH Risk Assessment Register
- Safety Data Sheets (SDS) file
- Training records
- Health surveillance records (where applicable)
- Accident and incident records
- Waste disposal records

Useful contacts:

- HSE Infoline: 0300 003 1747
- HSE website: www.hse.gov.uk
- CLEAPSS Helpline: 01895 251496 (for science and D&T advice)
- NHS 111 (for health advice)
- National Poisons Information Service: Available through NHS 111

8. Training Requirements

8.1 Staff training

- All staff who use or may be exposed to hazardous substances must receive appropriate COSHH training.

Induction training for all new staff will include:

- Overview of this COSHH Policy
- How to access COSHH assessments and Safety Data Sheets
- Basic principles of safe handling of substances
- Emergency procedures
- How to report concerns

Task-specific training will be provided for staff who:

- Use hazardous substances regularly
- Supervise pupils using hazardous substances

- Manage areas where hazardous substances are stored or used
- Are responsible for completing COSHH assessments

Training content will include:

- The specific hazards of substances they use
- How to read and understand Safety Data Sheets
- How to follow COSHH assessments
- Correct use of control measures (including PPE)
- Safe storage and handling procedures
- Emergency procedures and first aid
- Waste disposal requirements
- How to recognise and report symptoms of ill health

Refresher training will be provided:

- At least annually for all staff
- More frequently for high-risk activities
- When new substances are introduced
- When procedures change
- Following incidents or near misses

Training for COSHH assessors: Staff designated to complete COSHH assessments will receive specific training covering:

- Legal requirements of COSHH regulations
- How to read and interpret Safety Data Sheets
- Risk assessment methodology
- Hierarchy of control measures
- How to complete COSHH assessment forms
- When to seek specialist advice

8.2 Training records

- The school will maintain records of all COSHH training, including:
- Name of person trained
- Date of training
- Type of training (induction, task-specific, refresher)
- Topics covered
- Trainer name
- Date refresher training due
- Training records will be:
- Kept securely
- Reviewed regularly to identify when refresher training is due
- Available for inspection by managers and external inspectors

8.3 Pupil instruction

- Pupils who use hazardous substances as part of their learning must receive appropriate instruction, which should be:
- Age-appropriate and suitable for their level of understanding
- Adapted for pupils with SEMH needs
- Integrated into lesson planning
- Delivered before pupils use substances
- Reinforced regularly

Pupil instruction should cover:

- The hazards of the substances they will use
- Safe handling procedures
- What to do in an emergency
- The importance of following instructions
- How to report concerns

For pupils with SEMH needs, additional considerations include:

- Clear, simple instructions
- Visual aids and demonstrations
- Additional supervision
- Individual risk assessments where necessary
- Consideration of emotional regulation and impulsivity

9. Specific Considerations for SEMH Settings

As a specialist SEMH school, The Damara School recognises that additional measures may be necessary to ensure the safe management of hazardous substances.

9.1 Enhanced security

- All hazardous substances must be stored in locked cupboards or storage areas
- Keys must be controlled and only held by authorised staff
- A key register must be maintained
- Storage areas must be checked regularly to ensure security has not been compromised
- Consideration should be given to additional security measures such as alarmed cupboards for high-risk substances

9.2 Individual risk assessments

- Where pupils with specific SEMH needs are identified as being at increased risk in relation to hazardous substances, individual risk assessments should be completed considering:
- The pupil's specific needs and behaviours

- Previous incidents or concerns
- Strategies to manage risk
- Additional supervision requirements
- Alternative approaches or materials

9.3 Supervision

- Supervision levels should be appropriate to the needs of the pupils and the risks involved
- Staff should be positioned to maintain visual oversight of all pupils
- Substances should never be left unattended when pupils are present
- Clear protocols should be in place for managing challenging behaviour during activities involving hazardous substances

9.4 Incident response

- Staff should be prepared for the possibility that pupils may:
- Deliberately misuse substances
- Refuse to follow safety instructions
- Become dysregulated during activities involving substances
- **Response procedures should include:**
- De-escalation strategies
- Removal of substances to a safe location
- Support for the pupil
- Incident recording and review
- Review of risk assessments and control measures

9.5 Communication with parents/carers

- Parents and carers should be informed:
- About the substances their child will use in school
- About the safety measures in place
- If there are any specific concerns about their child's interaction with hazardous substances
- Following any incidents involving their child

10. Equality and Inclusion

The school is committed to ensuring that COSHH arrangements do not discriminate against any individual or group and that reasonable adjustments are made where necessary.

Considerations include:

- **Pregnancy and breastfeeding:** Specific risk assessments will be completed for pregnant or breastfeeding staff who may be exposed to hazardous substances

- **Disabilities:** Reasonable adjustments will be made to enable staff and pupils with disabilities to work safely with substances
- **Health conditions:** Staff with health conditions that may be affected by substances (e.g. asthma, skin conditions) will be supported through individual risk assessments
- **Language barriers:** Information and training will be provided in accessible formats for those whose first language is not English
- **Literacy:** Visual aids and practical demonstrations will be used to support those with literacy difficulties
- **Cultural and religious considerations:** Alternative materials will be considered where substances conflict with cultural or religious beliefs

11. Roles Summary

Role	Key COSHH Responsibilities
Trust Board	- Ensure adequate resources - Review policy every 3 years - Monitor compliance through reports
Deputy head	- Overall responsibility for COSHH compliance - Ensure assessments are completed - Ensure staff are trained - Monitor and review arrangements - Report to Trust Board
Line Managers	- Ensure assessments for their areas - Ensure staff in their teams are trained - Monitor compliance in their areas - Investigate incidents
COSHH Co-ordinator	- Maintain COSHH register - Co-ordinate training - Conduct audits - Provide advice and support
All Staff	- Follow COSHH assessments - Use control measures correctly - Report concerns and symptoms - Attend training
Contractors	- Provide their own assessments - Ensure their staff are trained - Comply with school requirements

Appendices

Appendix 1: Hazard Symbols and Their Meaning

The following hazard symbols are used under the Classification, Labelling and Packaging (CLP) Regulation to indicate the hazards associated with chemical substances and mixtures.

There are nine primary hazard pictograms:



1. Skull and Crossbones (GHS06)

- **Meaning:** Acute toxicity (fatal or toxic)
- **Hazard:** Can cause death or serious harm if swallowed, inhaled, or absorbed through the skin
- **Examples:** Pesticides, methanol, strong acids and alkalis
- **Precautions:** Avoid all contact; use in well-ventilated areas; wear appropriate PPE

2. Exclamation Mark (GHS07)

- **Meaning:** Health hazard or hazardous to the ozone layer
- **Hazard:** May cause less serious health effects or damage to the ozone layer
- **Examples:** Irritants, skin sensitisers, substances harmful if swallowed
- **Precautions:** Avoid contact; follow instructions carefully; wash hands after use

3. Health Hazard (GHS08)

- **Meaning:** Serious health hazard
- **Hazard:** May cause or is suspected of causing serious health effects including:
- Cancer

- Respiratory sensitisation
- Reproductive toxicity
- Target organ toxicity
- Aspiration hazard
- **Examples:** Carcinogens, mutagens, substances toxic to reproduction
- **Precautions:** Avoid exposure; obtain special instructions before use; wear respiratory protection if required
-

4. Environment (GHS09)

- **Meaning:** Hazardous to the aquatic environment
- **Hazard:** May cause long-lasting harmful effects to aquatic life
- **Examples:** Pesticides, biocides, petroleum products
- **Precautions:** Avoid release to the environment; dispose of properly through licensed waste carriers

5. Corrosion (GHS05)

- **Meaning:** Corrosive
- **Hazard:** Causes severe skin burns and eye damage; may be corrosive to metals
- **Examples:** Strong acids and alkalis, drain cleaners, oven cleaners
- **Precautions:** Wear protective gloves, eye protection, and face protection; do not breathe mist or vapour
-

6. Flame (GHS02)

- **Meaning:** Flammable
- **Hazard:** Highly flammable liquids, gases, aerosols, or solids
- **Examples:** Petrol, aerosols, nail polish remover, some adhesives
- **Precautions:** Keep away from heat, sparks, open flames, and hot surfaces; store in well-ventilated area

7. Flame Over Circle (GHS03)

- **Meaning:** Oxidising
- **Hazard:** May cause or intensify fire; may cause combustion of other materials
- **Examples:** Bleach, hydrogen peroxide, oxygen, nitrates
- **Precautions:** Keep away from heat and other sources of ignition; keep away from combustible materials

8. Exploding Bomb (GHS01)

- **Meaning:** Explosive
- **Hazard:** May explode due to fire, shock, friction, or heating

- **Examples:** Fireworks, ammunition, some organic peroxides
- **Precautions:** Keep away from heat, sparks, and flames; handle with extreme care

9. Gas Cylinder (GHS04)

- ![Compressed gas symbol]
- **Meaning:** Gas under pressure
- **Hazard:** Contains gas under pressure; may explode if heated; refrigerated liquefied gas may cause cryogenic burns
- **Examples:** Compressed air, propane, carbon dioxide cylinders
- **Precautions:** Protect from sunlight; store in well-ventilated area; handle carefully to avoid damage

Understanding Signal Words

- Products will also display signal words indicating the level of severity:
- **DANGER** = More severe hazards
- **WARNING** = Less severe hazards

Hazard Statements

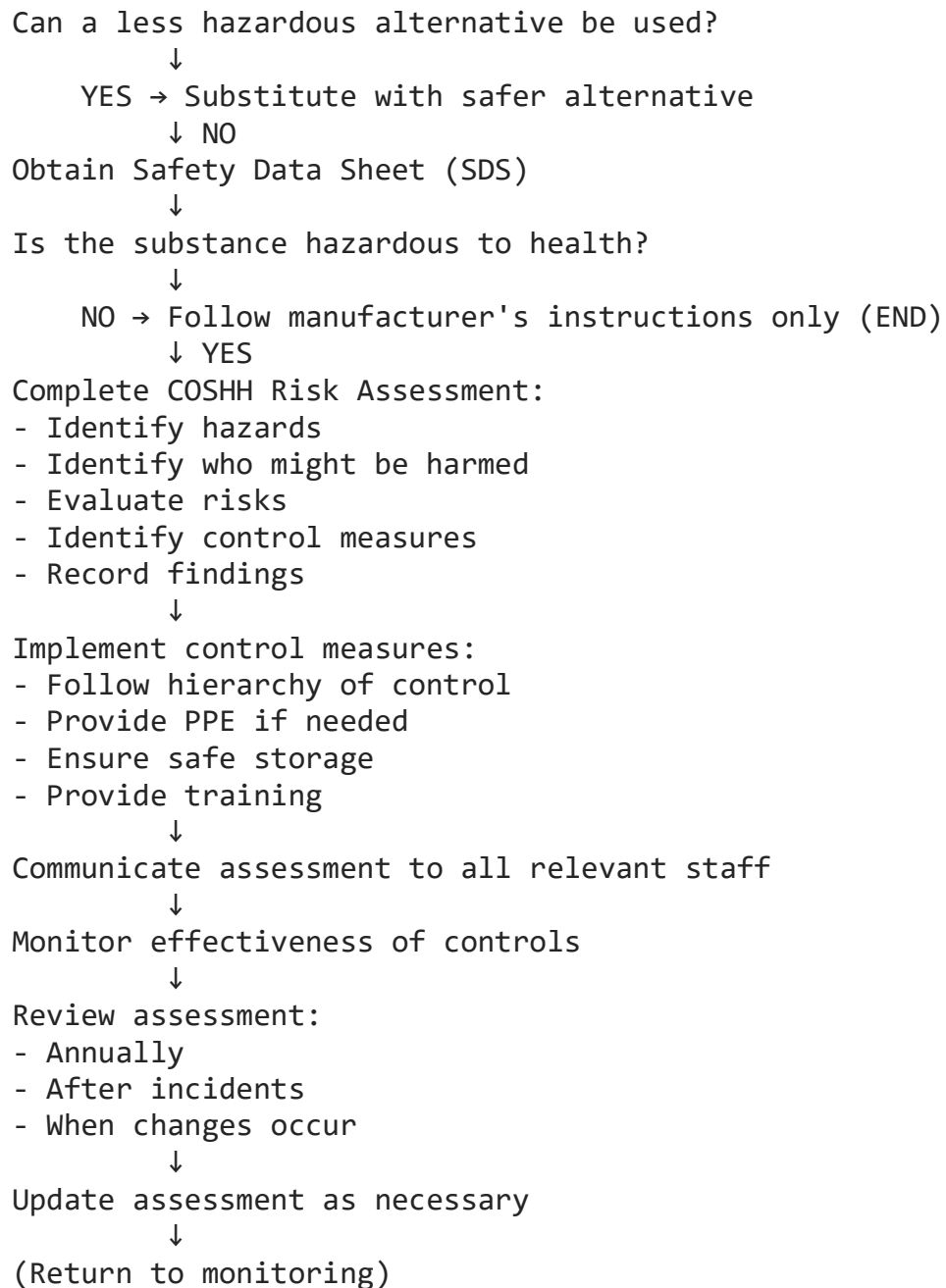
- Products will include hazard statements (H-statements) that describe the nature of the hazard, for example:
- H301: Toxic if swallowed
- H314: Causes severe skin burns and eye damage
- H411: Toxic to aquatic life with long lasting effects

Precautionary Statements

- Products will include precautionary statements (P-statements) that describe measures to prevent or minimise adverse effects, for example:
- P280: Wear protective gloves/protective clothing/eye protection/face protection
- P301+P310: IF SWALLOWED: Immediately call a POISON CENTER/doctor
- P403+P235: Store in a well-ventilated place. Keep cool
-

Appendix 2: COSHH Assessment Process Flowchart

- START: New substance to be used
 - ↓
 - Can the use of this substance be avoided?
 - ↓
 - YES → Don't use it (END)
 - ↓ NO



Appendix 3: COSHH Risk Assessment Form

THE DAMARA SCHOOL - COSHH RISK ASSESSMENT

Information sheets for all COSHH products are held in the Admin Office. In addition, COSHH risk assessments can be completed and stored for each product on SmartLog.