Hampstead Hill School
Health and Safety Policy:
Control of Substances Hazardous to Health (COSHH)

Introduction

In one form or another, the COSHH regulations have been in place since 1988. The 2002 regulations (as amended) supersede all previous versions.

The regulations lay down the essential requirements and step-by-step approach to avoid, or otherwise reduce, the exposure to substances hazardous to health. The regulations apply to substances that, under the Chemicals (Hazard, Information and Packaging for Supply) Regulations (CHIP), have already been classified as:

- Very toxic
- Toxic
- Harmful
- Corrosive
- Sensitising
- Irritant

(Such substances are labelled with an appropriate sign)

- Substances that have been assigned a workplace exposure limit (WEL) - {see below for definition}

- Substances that have chronic or delayed effects, such as those which are carcinogenic (likely to cause cancer), mutagenic (likely to cause cell mutations) or toxic for reproduction.

- Biological agents that chiefly cover micro-organisms such as bacteria, viruses, fungi and microscopic parasites.

COSHH applies to a wide range of substances used directly in work activities including proprietary cleaning products, solvents, laboratory reagents, adhesives, varnishes and pesticides. COSHH also applies to substances generated during work activities, such as wood dust and fumes. Furthermore, COSHH covers naturally occurring substances such as grain dust.
However, the regulations do not apply to the following hazards that are covered by separate legislation:

- Lead
- Asbestos
- Radioactivity
- High/low pressures
- Explosion and flammable risks

Examples of the effects of hazardous substances include:

- Skin irritation or dermatitis as a result of skin contact
- Asthma as a result of developing an allergy to substances used at work
- Loss of consciousness as a result of being overcome by toxic fumes
- Cancer, which may appear long after the exposure to the substance that caused it
- Infection from bacteria and other micro-organisms.

COSHH places a duty on the employer to undertake a risk assessment in order to determine what action needs to be taken to prevent employees (and others) from being exposed to hazardous substances used at work. For practical purposes, risk assessments should be undertaken by managers or nominated staff. In order to comply with the regulations the following seven steps must be followed:

- Assess the risks
- Decide what precautions are needed
- Prevent or adequately control exposure
- Ensure that control measures are used and maintained
- Monitor exposure
- Carry out appropriate health surveillance
- Prepare plans and procedures to deal with accidents, incidents and emergencies
- Ensure that employees are properly informed, trained and supervised

The Approved Code of Practice sets out two routes for compliance. These eight steps are explained in greater detail below:
**Step 1 - Assess the risks**

The risks to health arising from hazardous substances used in workplace activities must be assessed. It is a requirement that all substances in the workplace are identified and the risks that these substances present are considered. Assessing the risks involves making a judgement as to how likely it is that a hazardous substance will affect someone’s health, taking into account:

- How much of a substance is used and how people could be exposed to it
- Who could be exposed to the substance and how often this could occur
- The means by which a substance can enter the body, namely by inhalation, ingestion or absorption through the skin.

The person undertaking the risk assessment should have an understanding of the regulations be able to obtain all necessary information and have the knowledge and experience to make correct decisions about the risks and the actions needed.

**Step 2 - Decide what precautions are needed**

The person(s) undertaking the assessment must be able to decide what precautions are needed to remove or reduce risks to acceptable levels. If there is no risk to health or the risk is trivial then the risk assessment can be judged to be complete. However, if there are significant risks action must be taken to protect the health of employees and others who may be affected.

The assessment should be re-examined if circumstances change and reviewed in the following circumstances:

- At least every five years
- Whenever there is reason to think it is no longer valid
- Where there has been a significant change in the work.

The risk assessment form allows staff to indicate when the next review is planned.
Step 3 - Prevent or adequately control exposure

Prevent exposure

It is a requirement of COSHH that exposure to hazardous substances is prevented or adequately controlled. If it is reasonably practicable to do so an employer might:

• Change the process or activity so that the hazardous substance is not needed or generated (eliminate)

• Substitute the substance with a safer alternative

• Use the substance in a safer form.

Adequately control exposure

If prevention is not reasonably practicable, exposure must be controlled using one or more of the following measures:

• Use appropriate work processes, systems and engineering controls, and provide suitable work equipment and materials, for example use processes which minimise the amount of material used or produced or equipment which totally encloses the process

• Control exposure at source, for example by using local exhaust ventilation (LEV) and reduce the numbers of employees exposed to a minimum, the level and duration of their exposure and the quantity of hazardous substances used or produced in the workplace.

• Provide personal protective equipment (PPE) but only as a last resort and never as a replacement for other control measures

Meaning of ‘adequate control’

Adequate control' of exposure to a substance hazardous to health now means:

• Applying the eight principles of good practice set out in schedule 2A to COSHH

• Not exceeding the workplace exposure limit (WEL) for the substance (if there is one)

• If the substance is known to cause cancer, heritable genetic damage or asthma, reducing exposure to as low a level as is reasonably practicable.

Step 4 - Ensure that control measures are used and maintained
Physical controls must be kept in efficient working order and good repair. Engineering controls and respiratory protective equipment (RPE) must be examined and, where appropriate, tested at suitable intervals. Local Exhaust Ventilation (LEV) must be examined every 14 months and records kept for five years. RPE must be ‘thoroughly examined’ at least every month, and more frequently when the conditions are particularly severe.

Employees are required to make full and proper use of the control measures and should, in particular:

- Use the control measures provided for materials plant and processes
- Wear in a proper manner the PPE provided
- Store PPE when not in use in the accommodation provided
- Remove any PPE before eating, drinking or smoking
- Practise a high standard of personal hygiene and make proper use of the facilities provided for washing, showering or bathing and for eating and drinking
- Report defects promptly.
Step 5 - Monitor exposure

The concentrations of hazardous substances in the air breathed in by workers must be measured if the assessment concludes that:

- There could be serious risks to health if control measures failed or deteriorated
- The workplace exposure limit might be exceeded
- Control measures might not be working properly.

Personal air monitoring must be sampled from the breathing zone.

Step 6 - Undertake Appropriate Health Surveillance

Health surveillance must be carried out in the following circumstances:

- Where the employee is working in one of the processes listed in Schedule 6 of COSHH (these principally involve the manufacture of extremely hazardous substances and are not likely to be encountered in local government)

- Where employees are exposed to a substance linked to a particular disease or adverse health effect and there is a reasonable likelihood under the conditions of the work of that disease or effect occurring and it is possible to detect the disease or health effect.

Health surveillance might involve examination by a doctor or trained nurse. A health record of any surveillance carried out must be kept for at least 40 years.

Step 7 - Prepare plans and procedures to deal with incidents and emergencies

This step applies where the work activity gives rise to extraordinary risks. As a result, it necessitates the need to plan for an emergency response and this will entail preparing procedures and setting up warning and communication systems to enable an appropriate response immediately. Emergency arrangements need to be available to those who need it and ‘safety drills’ need to be practised.

If an emergency incident should occur immediate steps must be taken to minimise the harmful effects, restore the situation to normal and inform employees that may be affected.
Step 8 - Ensure that employees are properly informed, trained and supervised

Employees must receive suitable information, training and supervision about:

- The name and nature of the substances they work with or are exposed to and the risks created by such exposure, and access to any data sheets that apply to those substances
- The main findings of the risk assessment
- The precautions they should take to protect themselves and others.
- How to use PPE provided
- The results of any exposure monitoring and health surveillance (whilst ensuring that personal confidentiality is maintained)
- Emergency procedures.
Safe measures for cleaning up a chemical spillage should be in place, as should hygienic measures for cleaning up bodily fluids, such as blood or vomit. Further information is given in the Corporate Infection Control policy.

**Local Exhaust Ventilation (LEV)**

LEV is widely used in Middle and High Schools to prevent exposure to hazardous substances such as dust and fumes. Such plant must be maintained by qualified engineers and examined every 14 months. Property Services arrange for fixed, large scale dust extraction units and fume cupboards to be maintained by reputable contractors. In the case of portable dust extraction units used in Middle School Design and Technology workshops (usually the HBY units) a service level agreement is offered by Local Services for this purpose. Schools not opting into this scheme must make suitable alternative arrangements of a comparable standard in order to demonstrate compliance.

A competent person should carry out an anemometer test annually to establish that the capture velocity of the HBY dust extraction unit is acceptable. It is also necessary to ensure that the fine filter underneath the machine is changed and that the motor is working effectively.

The HBY Unit should be emptied regularly to ensure that it works efficiently and to reduce the risk of fire. The Design and Technology teacher should carry out this task. Transferring the contents from the dust bag in the machine to a disposable bag can generate significant quantities of airborne dust. For this reason, an FFP3 dust mask, which provides a higher degree of protection against respirable particulates likely to cause damage, must be worn when this task is undertaken and a safe working procedure should be drawn up.

**Microbiology in Schools**

Micro-organisms are a diverse and fascinating group that can be used to illustrate a wide range of biological principles and processes. It should be noted, however, that it is now current practice to treat all microbial cultures as potential pathogens.

All practices and procedures should be undertaken in accordance with the guidance given by CLEAPSS and ASE.

**Information, Instruction and Training**

Several standard texts designed to enable schools to comply with COSHH are available on the CLEAPSS website and separately via the ASE.

CLEAPSS offers training to science teachers and technicians covering safe laboratory practice, safe handling, storage and disposal of chemicals, fume cupboard monitoring and microbiology, all of which make extensive reference to COSHH.
Since many schools are multi-occupancy sites, it is essential that the information on cleaning products should also be in the possession of the Head, as controller of the premises.

This requirement is necessary whether the school manages the cleaners/caretaker themselves, buy these services via a service level agreement or use the services of a contractor. Furthermore, the first aiders who will have to administer treatment in an emergency need this information. It is important to note that the hazardous products in use also pose a risk to persons other than those using them, particularly pupils who could inadvertently be exposed to them.

Contractors bringing hazardous chemicals onto the school site should provide details to the school and, likewise, the school should inform them of any hazardous substances used in school with which they may come into contact.

Date adopted: September 2016

Updated September 2016

Name: Andrea Taylor

Signed:
COSHH Risk Assessment No:

<table>
<thead>
<tr>
<th>Group:</th>
<th>Establishment/Section:</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)

Location of process being carried out?

Identify the persons at risk:  
Employees (including trainees) | Contractors | Public (including students)

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)

Classification (state the category of danger)

<table>
<thead>
<tr>
<th>Very Toxic</th>
<th>Irritant</th>
<th>Extremely Flammable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Toxic</td>
<td>Sensitising</td>
<td>Highly Flammable</td>
</tr>
<tr>
<td>Corrosive</td>
<td>Biological</td>
<td>Flammable</td>
</tr>
<tr>
<td>Harmful</td>
<td>Oxidising</td>
<td>Environmental</td>
</tr>
</tbody>
</table>

Hazard Type

<table>
<thead>
<tr>
<th>Gas</th>
<th>Vapour</th>
<th>Mist</th>
<th>Fume</th>
<th>Dust</th>
<th>Liquid</th>
<th>Solid</th>
<th>Other (State)</th>
</tr>
</thead>
</table>

Route of Exposure

<table>
<thead>
<tr>
<th>Inhalation</th>
<th>Skin</th>
<th>Eyes</th>
<th>Ingestion</th>
<th>Other (State)</th>
</tr>
</thead>
</table>

Workplace Exposure Limits (WELs) please indicate n/a where not applicable

Long-term exposure level (8hrTWA):  
Short-term exposure level (15 mins):

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>Equipment</th>
<th>☐ Dust mask</th>
<th>☐ Visor</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Respirator</td>
<td>☐ Goggles</td>
<td></td>
</tr>
<tr>
<td>☐ Gloves</td>
<td>☐ Overalls</td>
<td></td>
</tr>
<tr>
<td>☐ Footwear</td>
<td>☐ Other</td>
<td></td>
</tr>
</tbody>
</table>

First Aid Measures

Storage

Disposal of Substances & Contaminated Containers

<table>
<thead>
<tr>
<th>Waste Type</th>
<th>☐ Skip</th>
<th>☐ Return to Depot</th>
<th>Return to Supplier</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hazardous Waste</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(If Other Please State): .................................................................

Is exposure adequately controlled? Yes ☐ No ☐

Risk Rating Following Control Measures

<table>
<thead>
<tr>
<th>Risk Rating</th>
<th>☐ High</th>
<th>☐ Medium</th>
<th>☐ Low</th>
</tr>
</thead>
</table>

HHS Health and Safety Policy – COSHH

September 2016
Review date: September 2017
# Guidance on Completing the COSHH Risk Assessment Form

<table>
<thead>
<tr>
<th>Risk assessment number.</th>
<th>Enter a suitable identification number.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directorate.</td>
<td>Enter the name of the Directorate.</td>
</tr>
<tr>
<td>Establishment/Section.</td>
<td>Enter the name of the establishment/section where the process is being carried out.</td>
</tr>
<tr>
<td>Describe the activity or work process.</td>
<td>Give a simple description of what the process is, for example cleaning floors and walls. State any equipment used in carrying out the process/activity, for example cloth, spray, tank, etc.</td>
</tr>
<tr>
<td>Location of process being carried out.</td>
<td>Specify exactly where the process is carried out, for example Maintenance Workshop Number 2.</td>
</tr>
<tr>
<td>Name the substance involved in the process and its manufacturer.</td>
<td>Give the name of the substance being use. In most cases there will only be one substance involved. Enter the name of the manufacturer of the substance. If more than one is involved, complete a separate assessment sheet with the same reference number and a suitable additional suffix, such as a, b, c etc. Where the process involves more than one substance, verify that all substances are compatible with each other. Manufacturers should be consulted to verify that there will be no adverse reaction between the substances to be used in the process. In some cases it may not be acceptable even to store incompatible substances together. A current up-to-date safety data sheet provides important information on many aspects of the substance in use. It is important that a current up-to-date version (conforming to CHIP) is attached to the risk assessment.</td>
</tr>
<tr>
<td>Classification.</td>
<td>Tick the box to indicate the appropriate category after referring to the safety data sheet and/or container.</td>
</tr>
<tr>
<td>Hazard Type.</td>
<td>Identify the hazard types that will arise from use of the substance in this process. Tick all boxes that apply.</td>
</tr>
<tr>
<td>Route of exposure.</td>
<td>Indicate the route by which the substance will enter the body.</td>
</tr>
<tr>
<td>Workplace Exposure Limits (WEL).</td>
<td>Check the manufacturer’s safety data sheet to see if the substance has been assigned a WEL. If it has the limit should be stated.</td>
</tr>
<tr>
<td>State the risks to health from identified hazards.</td>
<td>Describe the risks to the health of the employees when using the substance or when engaged in the process/activity, for example Irritant - irritating to the eyes, respiratory system and skin.</td>
</tr>
</tbody>
</table>
Control Measures. | All controls required to reduce the risks associated with the use of the substance (other than Personal Protective Equipment) should be identified here. The information stated should be very specific. If ventilation is required then the type of ventilation should be documented, for example local exhaust ventilation with partial enclosure. If training is identified as a control then the level or standard of training required should be stated, for example Pesticides PA1.

Where a WEL has been assigned then the method for monitoring that the levels are not exceeded should also be stated, for example personal monitoring.

Is health surveillance or monitoring required? | The use of certain substances may require the persons using them to have their health monitored. This may take the form of simple observations made by a Supervisor, as is the case for monitoring dermatitis from using oil. Alternatively, it may require more complex monitoring by the Occupational Health Unit, for example lung function tests to check the effects of dust or fumes on the lungs. If there is any doubt over the requirements for health surveillance then the Occupational Health Unit, should be contacted.

Personal Protective Equipment (PPE). | Any PPE required for use with this substance should be identified. Tick all appropriate boxes and then specify the type and standard of equipment to be used, for example eye protection - goggles to BS EN 166 - 349B.

First aid measures. | State what first aid equipment is available on site, for example first aid box, eye irrigation tube.

Storage. | Indicate how and where the substance is stored.

Disposal of substances and contaminated containers. | Detail how the substance is to be disposed of and remember to consider the containers as well as these may contain hazardous residues. Ensure that risks to the environment are considered.

Risk rating following control measures. | Having implemented the appropriate control measures, apply the risk rating to indicate whether the risks are high, medium or low.

Assessed by and date. | Enter the date when the assessment was carried out. Sign and date the risk assessment. Please ensure that the signature is legible.

Review date. | Enter the date when a re-assessment should be carried out. This will normally be one year after the first assessment. However, high-risk processes may need to be re-assessed more frequently. In addition, if any of the elements of the process/activity alter then the re-assessment should be carried out immediately.