



COSHH Policy

“Everyone who works with children should do what is in the best interests of the child.”

Article 3 United Nations Rights of the Child

At, Trinity School, we respect and value all children and are committed to providing a caring, friendly and safe environment for all our pupils so they can learn in a relaxed and secure atmosphere. We believe every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm. This is the responsibility of every adult employed by or invited to deliver services at Trinity School. We recognise our responsibility to safeguard all who access school and promote the welfare of all our pupils by protecting them from physical sexual and emotional abuse, neglect and bullying.

Legislation and Guidance

The Control of Substances Hazardous to Health (COSHH) regulations came into force in March 1999, with amendments in 2002 and 2004. Current regulations supersede all earlier COSHH regulations.

This policy has been written with reference to DfE non-statutory guidance, Nov 2017 “Safe storage and disposal of hazardous materials and chemicals”.

Trinity School must comply with COSHH regulations to provide staff and pupils with a safe and healthy environment. The regulations apply to all hazardous substances or products which arise out of or in connection with any activity. These regulations provide a comprehensive and systematic approach to the control of hazardous substances and are designed to:

- Provide a single uniform set of regulations covering all hazardous substances
- Meet the requirements of the relevant European Health and Safety directives
- Set out basic principles for related occupational health

Definitions

Hazardous Substances: Any substances with the potential to cause harm to people and/or the environment. They can occur in many forms, e.g. gas, vapour, liquid, dust or solid material.

This definition covers a wide range of substances in use in the school. Examples of hazardous substances may include (but are not limited to):

- Chemicals used for teaching science, art and design
- Chemicals that contain pigments and dyes
- Chemicals used to clean toilets or floors
- Caustic products used as cleaning agents, e.g. catering
- Drain cleaning chemicals
- Pesticides are used to maintain grounds

As a general guide, if a container or package has warning labels (symbols or text) printed on it, it will likely come within COSHH regulations and, therefore, must be assessed. However, in doing so, common sense should be exercised. For example, the solvent used in correction fluid is a hazardous substance;

however, the amount a person uses at any one time is so small no usage control measure needs to be in place. The only control measure would be around storage and ensuring it is not accessible by pupils.

Health Surveillance: Monitoring the effect of exposure on individuals regarding their health and safety. A risk assessment identifies this, which must be completed and stored with the material data safety sheets (see below). Other objectives in carrying out health surveillance include:

- Checking the effectiveness of risk control measures
- Providing effective risk assessment
- Identifying and protecting individuals at risk

Material Safety Data Sheet (MSDS): Forms which contain particular information on hazardous substances to ensure safe use.

This includes the handling, storage, transportation and disposal of hazardous substances. Manufacturers are required by law to supply this information. When purchasing such substances, an MSDS will be obtained **before** it can be used in the school.

Risk Assessment: The exercise of gauging the risk's size, type and shape and management decisions on whether to react to the risk. The main steps are:

- Hazard identification
- Risk evaluation
- Risk control

Basic Requirements of the Regulations

The regulations require schools to:

- Identify and assess the risk to health of any hazardous substances used in or around the site
Revise the risk assessment regularly and when:
 - Circumstances alter, and/or there are significant changes to the activity the assessment relates to
 - There is reason to believe that the risk assessment is no longer valid to prevent and/ or control the exposure of hazardous substances to staff, pupils and visitors
 - Monitor the exposure and check it against any limits set by the Health and Safety Executive (HSE)
 - Ensure regular health surveillance and health checks for persons at risk from hazardous substances
 - Regularly inspect and maintain any measures for controlling exposure, e.g. ventilation/extraction systems, protective clothing
 - Ensure staff and pupils are trained to correctly use any safety equipment/clothing

Responsibilities

The overall responsibility for ensuring compliance with the regulations rests with the governing board. On an operational basis, this is devolved in the first instance to Mrs Katy McMahon (Headteacher), who line manages Mrs Helen Racjan (School Business Manager) and Mr Callum O'Connor (Caretaker). Subject leaders (Design and Technology, Art and Science) and teachers must be aware of and ensure the regulations are met when lesson planning any activity using materials requiring COSHH documentation.

They are responsible for their health and those who may be affected by their activities, e.g. pupils, support staff, volunteers and students.

The regulations require the school to carry out appropriate risk assessments for all hazardous substances and ensure they are being used safely without risk to health and safety. Risk assessments should be kept for a minimum of 3 years after they are no longer required or are superseded by new assessments. If following a COSHH risk assessment, it is concluded that health surveillance is required; in such circumstances, the risk assessment must be kept for 40 years.

Staff responsible for purchasing chemicals, substances or products must ensure they are supplied with adequate information for their safe use, including MSDSs, where applicable.

Staff responsible for disposing of hazardous substances must ensure that all relevant regulations and best practices are considered before disposal/divestiture is carried out. (Guidance will be obtained from the Local Authority Occupational Safety Team and the Health and Safety Executive website).

Prohibited Substances

Some substances are prohibited or severely restricted, such as salt or substances containing any of the following compounds in a total concentration exceeding 0.1%:

- Benzidine
- Naphthylamine
- Aminodiphenyl
- Nitrodiphenyl

Substances containing more than 0.1% mass of the following are prohibited for use in diffusive applications, eg surface cleaning and fabric cleaning:

- Chloroform
- Carbon Tetrachloride
- Tetrachloroethane
- Pentachloroethane
- Dichloroethylene
- Trichloroethane
- Sand containing free silica
- Any substance containing compounds of silicon
- Ground or powdered flint, quartz other than natural sand
- Benzine

Hazardous Substances Categorisation

COSHH

Substances hazardous to health have been classified into different categories in the regulations.

According to COSHH regulations, substances that fall into any of the following categories must be considered hazardous to health

1. **WEL** – Substances assigned a Workplace Exposure Limit (WEL) are listed on the HSE website.

2. **CHIP** – Chemical Hazard Information and Packaging for Supply (CHIP) regulations list and categorise very toxic, harmful, corrosive or irritant substances
3. **Biological Agents** – Biological agents are classified into 4 groups as follows:
 - a. **Group 1** – unlikely to cause human disease
 - b. **Group 2** – can cause human disease but is unlikely to spread to the community, and prophylaxis or treatment is available
 - c. **Group 3** – can cause severe human disease and may spread to the community; no prophylaxis or treatment is available
 - d. **Group 4** – can cause severe human disease and is likely to spread to the community; no prophylaxis or treatment is available
4. **Carcinogens** – Carcinogens are:
 - a. Substances classified and indicated are carcinogenic or would be classified by the CHIP regulations. These can be identified by symbols or written risk phrases
 - b. Substances listed in Schedule 1 of the COSHH regulations. (This schedule lists those substances that are defined as carcinogenic but are not covered by CHIP regulations.)

Carcinogenic substances will not be used at Trinity School.

Substances for which the risk is cited as being a radioactive, explosive, flammable, oxidising agent, high/low temperature high pressure or asphyxiant are not covered by the COSHH regulations but will be subject to other legislation requiring a risk assessment. Lead and asbestos are also covered by separate specific legislation.

COSHH Risk Assessments

The COSHH risk assessment process involves looking at how hazardous substances are handled, used stored and disposed of and then making a judgement about the risk to the health and safety of people and environmental damage.

All substances defined earlier in this policy must be risk assessed. Staff must use the school's template to carry out COSHH risk assessments. It is also expected that staff will proactively seek and collate information from various sources when compiling the risk assessment. Examples are:

- Examine the information provided on the label
- Seek additional information from suppliers
- Read and comply with the MSDs, which gives detailed data on substances, including their physical and chemical properties
- Refer to HSE guidance
- Seek advice from the Local Authority Occupational Safety Team
- Source information from technical sources, publications, and trade associations

COSHH risk assessments will also consider the following:

- The route of entry of the substance into the body, e.g. inhalation, ingestion, absorption through the skin or mucus membranes, injection
- How the substance is used
- Quantities used
- How it is stored, transported and disposed of

Material Data Safety Sheets (MSDS) will be requested for all products/materials directly purchased. Once received, the Head Teacher will complete and sign off the risk assessment template. The product/material will not be used until the COSHH paperwork has been approved.

Should the school procure site cleaning under SLA to an external cleaning company, the contracted company will purchase all cleaning products/materials their staff use on site. They will be responsible for obtaining MSDs and carrying out COSHH risk assessments. The school reserves the right to view and obtain copies of such documentation.

Action Required to Reduce/Eliminate COSHH Risks

A record is kept of all significant COSHH assessment risks (i.e. those registering as Medium or High) so that it can be referred to and compared to subsequent assessments.

COSHH risk assessments will be reviewed periodically by the Senior Leadership Team and/or if any of the following scenarios apply:

- The current risk assessment is thought to be inadequate
- There is a change of material, process or work environment/method
- An accident has occurred involving COSHH substances
- There is a change of personnel
- There is a change in control measure
- New information (including exposure data) has become available

Appropriate training, instruction and supervision are given to all those using COSHH substances. Whenever possible, risk control will be achieved through the following:

- Using a less hazardous substance
- Having strict purchasing practices in place to ensure only substances allowed for the school are made available
- Amendments to planning if this will reduce the risk
- Adequate ventilation, extraction or similar control measures to limit exposure
- Displaying relevant safety signage
- Instituting hygiene measures to prevent or minimise the transfer of biological agents, including appropriate washing and toilet facilities and prohibiting eating/drinking where there is a risk of contamination
- Regular cleaning regimes for floors, surfaces, equipment and protective clothing (including safety glasses)
- Ensuring waste disposal arrangements are timely and safe

Access to COSHH Risk Assessments

COSHH risk assessments will be made available to:

- Staff (including supply staff), volunteers, students and contractors where appropriate
- Senior Leadership Team
- Enforcing Authorities upon request
- Interest parties via the Freedom of Information request process

Monitoring Exposure

Regular monitoring of exposure to hazardous substances will depend on the magnitude of the risk. Routine monitoring will be carried out when:

- There could be serious risks to health and safety if control measures fail or deteriorate
- There is uncertainty that exposure limits may have been exceeded
- There is uncertainty that control measures are adequate
- Staff/pupils display signs of exposure
- A complaint about exposure is received

Health Surveillance

Schools must have a health surveillance system if exposure to a hazardous substance has the potential for serious harm. This will involve the Local Authority Occupational Safety and Well-being Teams and a referral to Occupational Health.

Information, Instruction and Training

Appropriate information, instruction and training will be given to staff and, where appropriate, pupils. Individuals will be made aware of the following:

- COSHH risk assessments to include the nature and degree of risk involved
- The agreed control measures
- Provision of personal protective equipment
- Details of waste disposal, storage of substances and cleaning procedures
- How to handle hazardous substances and access to the MSDs
- Emergency measures
- Signs and symptoms of exposure (where known)

Reporting of Safety Events Involving COSHH Substances

Accidents, misuse and symptoms of exposure must be **immediately** reported to Mrs Katy McMahon, Headteacher or in their absence, a member of the Senior Leadership Team, who will expedite a swift response to ensure the safety of adults and pupils. A critical incident record will be commenced to evaluate the situation and determine further action. Cases of misuse may lead to formal disciplinary action being taken.

Katy McMahon/Helen Racjan – March 2024/March 2025

Policy to be reviewed and updated by March 2026