

Achieving Excellence

Document Control Sheet

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Control of Substances Hazardous to Health

1. PURPOSE

1.1 Introduction

1.1.1 The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended) are made under the Health and Safety at Work Act 1974. The regulations require an assessment to be undertaken by employers to ensure that the exposure of their employees to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled.

2. AIM OF STANDARD

2.1 The aim of this standard is to reduce, so far as reasonably practicable, the risk of injury associated with the use of hazardous substances at work and to set the requirements for compliance with the Control of Substances Hazardous to Health Regulations (COSHH). To meet this aim the school will assign responsibilities for managing the risk from the use of substances hazardous to health.

3. SCOPE AND RESPONSIBILITY

3.1 Scope

- 3.1.1 The School's approach for fulfilling its legal obligation under the COSHH Regulations is incorporated in this standard, which is intended as the minimum requirement for the use of all hazardous substances.
- 3.1.2 This standard provides details on the School's principles relating to the use of hazardous substances, organisational responsibilities, procedures and record keeping.
- 3.1.3 This standard applies to the School and covers full time and part time employees, temporary, agency and contract staff, volunteers and all other persons for whom the School has a direct or indirect responsibility i.e. students, contractors and visitors.

3.2 Responsibility

3.2.1 The procedures for managing and monitoring the risks associated with use of hazardous substances specified within this standard are detailed within the School health and safety arrangements.

4. REFERENCES AND RELATED DOCUMENTS

- 4.1 There are many regulations, codes of practice and guidance notes on managing hazardous substances. These relate to general principles, or are industry specific and substance specific. The following references and related documents are deemed to be of most relevance.
 - 4.1.1 The Approved Code of Practice to the COSHH Regulations 2002 (as amended), which provides guidance.
 - 4.1.2 Chemical (Hazard Information and Packaging for Supply) Regulations 2002, which impose duties on suppliers who distribute hazardous substances and defines, 'hazardous substances'.
 - 4.1.3 Health and Safety (Guidance) Series prepared by the HSE (HSG173), which provide general information on control related issues for hazardous substances e.g. ventilation, protective equipment, training etc. and the annually updated EH40.
 - 4.1.4 HSE website, "COSHH Essentials" at www.coshh-essentials.org.uk which provides general information for all topic areas together with a COSHH risk assessment tool.
 - 4.1.5 There is also industry specific guidance for construction, cleaning operations, wood dusts, educational establishments and printing etc.
- 4.2 The Approved Code of Practice for the COSHH Regulations gives guidance on how to deal with the risks associated with working with hazardous substances, and also on the requirements of the Health and Safety at Work etc. Act, 1974. A copy is available from the Health and Safety Manager.

5. **DEFINITIONS**

5.1 Hazard

- 5.1.1 A hazard for the purposes of COSHH is a substance with the potential to cause harm. For the purposes of COSHH these include:
 - 5.1.1.1 Substances or preparations classified as dangerous to health within the meaning of the Chemicals (Hazard Information & Packaging for Supply) Regulations 2009 (CHIP) and assigned a risk phrase, e.g. very toxic, toxic, harmful, irritant or corrosive. These may be solids, liquids, vapours or gases.
 - 5.1.1.2 Biological agents
 - 5.1.1.3 Dusts, of any kind, in substantial concentrations.

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5.1.1.4 Any other substances creating comparable hazards to people's health.

5.2 Risk

- 5.2.1 The risk from a substance is the likelihood that it will harm a person's health in the actual circumstances of use. This will depend on:
 - 5.2.1.1 The hazard presented by the substance
 - 5.2.1.2 Where and how it is used
 - 5.2.1.3 How exposure to it is controlled
 - 5.2.1.4 How much of the substance a person is exposed to and for how long
 - 5.2.1.5 Whether a person is particularly vulnerable to it i.e. sensitised
 - 5.2.1.6 The work a person does etc.

5.3 Workplace Exposure Limit (WEL)

- 5.3.1 From the 6 April 2005, a new focus on good practice was introduced to help employers and employees meet new control standards applicable to COSHH. The WEL is the maximum concentration of an airborne substance, averaged over an 8 hour or 15 minute reference period, to which employees may be exposed by inhalation under any circumstances and is specified, together with the appropriate reference period(s) in the HSE document EH40 (revised annually). WELs have a legal status and a duty is placed on the employer not to exceed them and to reduce any exposure, as far as is reasonably practicable, to a level below the WEL designed for a particular substance.
- 5.3.2 WELs should not be considered a hard and fast line between safe and unsafe. The principles of good control practice, if correctly applied, should ensure exposures are below any relevant WEL.

6. GOOD CONTROL PRACTICE PRINCIPLES

- 6.1 A hazardous substance must not be introduced to the workplace, so far as is reasonably practicable, unless it is necessary and there is no safer option. To ensure good practice, the following 8 principles are to be adhered to:
 - 6.1.1 Design and operate processes and activities to minimise emissions, release and spread of substances hazardous to health;

- 6.1.2 Take into account all relevant routes of exposure i.e. inhalation, skin absorption and ingestion, when developing controls;
- 6.1.3 Control exposure by means that are proportionate to the health risk i.e. the greater the health risk the greater the control required;
- 6.1.4 Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health;
- 6.1.5 Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment (PPE);
- 6.1.6 Check and review regularly all elements of control measures for their continuing effectiveness;
- 6.1.7 Inform and train all employees (and others who may be affected) on the hazards and risks from the substances with which they work and use the control measures developed to minimise the risks; and
- 6.1.8 Ensure that the introduction of control measures does not increase the overall risk to health and safety.

7. ADEQUATE CONTROL OF EXPOSURE

- 7.1 Adequate control of exposure requires employers and managers to:
 - 7.1.1 Apply the 8 principles of good practice for the control of substances hazardous to health;
 - 7.1.2 Ensure that the WEL is not exceeded; and
 - 7.1.3 Ensure that substances that can cause occupational asthma or cancer, or damage to genes that can be passed from one generation to another, are reduced to as low as is reasonably practicable.

8. PROCEDURE

- 8.1 A check is to be made to identify all and any hazardous substances (including dust) within the workplace. The Head of Department responsible for the substance is then to implement the following procedures:
 - 8.1.1 Substances hazardous to health shall <u>only be retained and used</u> where there is no reasonably practicable alternative. Account shall be taken regarding the degree of hazard and risk. Existing hazardous substances that are no longer required are to be disposed of safely and in accordance with current legislation.

- 8.1.2 A register (list) of substances hazardous to health shall be recorded and retained by a designated person at the appropriate management level i.e. Head of Department.
- 8.1.3 A Material Safety Data Sheet (MSDS or Data Sheet) for each hazardous substance shall be obtained from the supplier/manufacturer and kept available for reference in the event of an incident/accident. MSDS are essential when preparing COSHH assessments.
- 8.1.4 All hazardous substances identified on the register shall have a suitable and sufficient assessment, by a designated person, to consider the risks to the health of employees and others who may be affected e.g. students, contractors, visitors etc. (Heads of Department who believe they lack the competencies required to undertake assessment, should notify their line manager and seek support from the Business Manager Finance).
- 8.1.5 Where applicable, a written record of assessment shall be made and employees, and others affected, must be provided with training, instruction, information and supervision to ensure safe working and adequate understanding of the risks. An example of a COSHH assessment form that may be used can be found at Appendix 1. An example of a risk assessment checklist and form can be found at Appendix 2 and 3 respectively.
- 8.1.6 Following the assessment suitable and sufficient preventive and protective measures shall be introduced. Priority shall always be given to controlling exposures *generally* and not focus on individual personal protection. Personal protective equipment (PPE) shall be considered as a last resort, taking account of what is reasonably practicable.
- 8.1.7 For substances that are very toxic, carcinogenic, mutinogenic or have an assigned WEL the assessment shall be comprehensive to reflect the degree of risk and, where appropriate, environment monitoring and health surveillance shall be incorporated.
- 8.1.8 Based upon assessment, appropriate training, instruction, information and supervision shall be provided to all employees (and others who may be affected e.g. students) exposed to hazardous substances at work and in accordance with the normal management system. Assessments shall be reviewed when work activities change or produce information changes

9. RECORDS

9.1 Material Safety Data Sheets

9.1.1 Material Safety Data Sheets (MSDS or Data Sheet) are available, by law, from manufacturers or suppliers. They are to be stored on site, within the relevant department where substances are in use, and should be accessible and regularly updated where substances are replaced or new substances introduced.

9.2 COSHH Assessments

9.2.1 These should be written down with a requirement to review when new processes or replacement products are introduced or every 3 years, whichever is the sooner. They must be easily accessible to relevant staff.

9.3 Monitoring Systems

- 9.3.1 Where adequate control requires environmental monitoring, records are to be held for at least 5 years, or 40 years where employees can be personally identified.
- 9.3.2 Employers providing control measures must ensure they are properly used. COSHH requires that the exposure of workers to certain hazardous substances should be monitored.

9.4 Maintenance Records

9.4.1 Maintenance, inspection and testing requirements i.e. local exhaust ventilation (LEV)/ fume cupboards, respiratory protective equipment (RPE) etc, are subject to specific timescales as detailed in the Regulations. Records of these must be held on site and retained for 5 years.

9.5 Health Surveillance

9.5.1 In certain circumstances health surveillance is required. Records must be kept for 40 years.

APPENDIX 1

Activity							Date:	
Student / Staff Involvement								
SUBSTANCE/ACTIVI TY	HAZARD	CLASS	SEVERITY	PROB	RISK	SAFE	WORKING	NOTES

RISK ASSESSMENT

Risk Assessment No:

Assessment Date	Review Date	
Assessor/s Name	Checked by H /Manager	ead of Department
Department		
Brief Description of Area		
Nature of Work Carried Out		

<u> Hazard Identification – Checklist</u>

1. W	1. Workplace		No	Hazard Description	More on RA 2
1.1	Access/Egress				
1.2	Lighting				
1.3	Heating/ Ventilation				
1.4	Floors/Steps				
1.5	Storage				
1.6	Doors/ Windows				
1.7	Noise				
1.8	Fixtures/ Fittings				
1.9	Supervision/ Control				
1.10	Other				

2. Activities		Yes	No	Hazard Description	More on RA 2
2.1	Housekeeping				
2.2	Slips, trips and falls				
2.3	Falls from Height				
2.4	Manual Handling				
2.5	Driving				
2.6	Repetitive				
2.7	Difficult Postures				
2.8	Other				
	ools and ipment	Yes	No	Hazard Description	More on RA 2
3.1	Sharps				
3.2	Hot Surfaces				
3.3	Cold Surfaces				
3.4	Direct Electrical Contact				
3.5	Indirect Electrical Contact				
3.6	Other				
4. N	laterials	Yes	No	Hazard Description	More on RA 2
4.1	Toxic Fluids				
4.2	Toxic Gas/Fume/Mist				
4.3	Toxic Dust				
4.4	Flammable Fluids				
4.5	Flammable Gas/Fume/Mist				
4.6	Flammable Dust				
4.7	Explosive Substances				

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4.8	Spillages				
4.9	Body Fluids				
4.10	Animal Products				
4.11	Biological Hazards				
4.12	Legionella Hazard				
4.13	Materials with WEL				
4.14	Other				
Arra	lanagement angements	Yes	No	Hazard Identification	More on RA 2
5.1	Work Pattern				
5.2	Rest Breaks				
5.3	Wellbeing				
5.4	Training				
5.5	Lone Working				
5.6	Other				
	echanical	Yes	No	Hazard Identification	More on RA 2
	ards Crushing				
6.2	Cutting/ Shearing				
6.3	Entanglement				
6.4	Drawing in/ Trapping				
6.5	Impact				
6.6	Stabbing				
6.7	Abrasion				
6.8	High Pressure Injection				
6.9	Other				

7. Ra	7. Radiation Yes		No	Hazard Identification	More on RA2
7.1	Laser				
7.2	Ionising				
7.3	Electromagnetic				
7.4	Other				

Department	
Assessment Date	Review Date
Assessors Name	Managers Name

Ref from RA1	Hazard Description	Details:- 1. Who is at risk? 2. When are they at risk? 3. Where are they at risk? 4. What are the current controls?	Probability of incident (Use scale from 0 – 5)	Severity of result (Use scale from 1 – 5)	Risk Rating (Probability x Severity)	Recommended Actions and Responsible Person	Target Date
1.1		1. 2. 3. 4.					
1.2		1. 2. 3. 4.					
1.3		1. 2. 3. 4.					
1.4		5. 6. 7. 8.					
1.5		1. 2. 3. 4.					
1.6		1. 2. 3.					