

Staffordshire University Academies Trust		Trust Policy Document			
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Policy for the Control of Substances Hazardous to Health

COSHH stands for 'Control of Substances Hazardous to Health.' Under the Control of Substances Hazardous to Health Regulations 2002, employers need to either prevent or reduce their workers' exposure to substances that are hazardous to their health.

1. Success Indicators

- Substances to which employees and others may be exposed are identified.
- Substances are assessed to identify risks to health and the assessments are subject to regular review.
- Safe practices and suitable control measures are identified, instigated, maintained and monitored.
- Relevant information regarding substances is provided for employees.
- Information, instruction and training regarding substances is provided for employees.
- Current material safety data sheets are readily accessible.
- Where necessary, health monitoring and surveillance is undertaken.

2. Overview

It is a legal requirement for every employer to make an assessment the substances associated with their activities that might pose a risk to the health and safety of employees. Employers must reduce the risk from substances as far as “reasonably practicable”.

COSHH covers substances that are hazardous to health. Substances can take many forms and include:

- Chemicals
- Products containing chemicals
- Fumes
- Dusts
- Vapours
- Mists
- Gases and asphyxiating
- Biological agents (germs)

Hazardous substances may be found in a range of working environments including:

- Cleaning
- Catering classrooms
- Kitchens
- Staff rooms
- Art and DT
- Site working

3. Health, Safety and Wellbeing Management Arrangements

These arrangements will apply to employees, pupils, service users, contractors and members of the public if they are on SUAT premises.

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Identification of Substances

The responsible persons must identify hazardous substances that are used, stored or to which individuals are exposed. These substances may be:

- Brought into the workplace to be used, worked on or stored.
- Given off, during any process or work activity such as dust, fumes and vapours;
- Produced at the end of any work process such as waste or residues.

Each Academy must:

- Keep a log of all substances hazardous to health used on the premises using a Register of assessed substances
- Make sure all hazardous substances on the premises are stored and used safely.
- Safely dispose of any substances that are no longer required.
- Obtain a supplier's Safety Data Sheet for every hazardous substance being stored and used on site.
- Determine whether it is possible to eliminate the need to use any of the remaining substances by modifying current working methods.
- Identify whether it is possible to substitute any substance with an equally effective but less hazardous material.
- Undertake a COSHH risk assessment of the use of each remaining hazardous substance.
- Identify what precautions or control measures are required to completely eliminate the risk or reduce them to the minimum level possible.
- Implement the precautions.
- Record the COSHH assessment.
- Provide all staff with adequate training and information on the safe use of hazardous substances and safe working procedures to be followed by staff and pupils/students.
- Monitor the use of hazardous substances periodically to check that precautions are being properly followed.
- Periodically examine and test all mechanical control systems (such as fume cupboards and dust extraction) to ensure efficient operation. Keep records of all checks.
- Review all assessments and safe working practices periodically to ensure they remain valid (annually as a minimum or upon a change to the use or makeup of the substance).
- Inform all new staff of the above information as part of their induction and provide refreshers for staff on the use of hazardous substances, periodically.

Risk assessment

Academies must ensure a suitable and sufficient risk assessment is undertaken for each substance and the risks associated with the use of that substance. A written record of the assessment must be kept using a COSHH Assessment form and be made available to employees. Where similar substances with identical hazards and routes of entry are to be assessed, they may be grouped together and assessed as one e.g. different brands of oil with the same qualities. Collecting safety data sheets and other information about a substance is not sufficient to satisfy the requirements of the legislation to carry out an assessment.

The assessment must consider the risks created by working with a substance and not solely the hazardous properties of the substance itself. Consideration must be given to the form of the substances used and produced and if they are likely to be combined with any other substance during the work process to present additional/different hazards. The information must be used to help identify suitable controls to protect those who may be exposed to the substance.

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The level of toxicity of a substance will be affected by the amounts to which people are exposed and the routes of exposure that the use of the substance causes and this should be considered during the risk assessment process.

There is a hierarchy of preferred methods of controlling exposure to hazardous substances based on their effectiveness:

- (a) Elimination of the use of the hazardous substance;
- (b) Modification of the substance, e.g. use a paste rather than a powder.
- (c) Modification of the process and/or workplace e.g. using a vacuum rather than brushing;
- (d) Applying controls to the process, such as enclosures and Local Exhaust Ventilation (LEV);
- (e) Ways of working which minimise exposure; (safe systems of work) and
- (f) Equipment or devices worn by exposed individuals (Personal Protective Equipment PPE).

Unless the use of a substance can be eliminated it is normal for a combination of methods to be used as controls.

Academies are responsible for maintaining a register of substances which have been risk assessed and for which adequate control measures have been identified and implemented for specified uses in their workplace or the work activities for which they are responsible. Substances should not be purchased or used until an assessment has been completed, the appropriate control measures identified and implemented.

Maintenance of Control Measures

Control measures including fume cupboards and Local Exhaust Ventilation (LEV) must perform as originally intended, and should adequately control the exposure of employees to substances hazardous to health. Where equipment is used as a control measure it should be monitored for deterioration regularly and the frequency of the checks should reflect the likelihood of deterioration of that part of the control measure and its importance.

Where possible, equipment used as a control measure should be visually checked, at appropriate intervals and without undue risk to maintenance staff. Visual checks should be made in advance of each use of the equipment. In the case of local exhaust ventilation (LEV) and work enclosures, such checks should be carried out at least once a week. Local exhaust ventilation (LEV) systems must be thoroughly examined and tested by a competent person (contractor) and a certificate issued at least once every 14 months.

Workplace Exposure Limits

For substances that can be inhaled, the controls which are implemented must consider any Workplace Exposure Limit (WEL) that is in place for the substance. The identification of substances that can be inhaled will be identified through the COSHH assessment. Substances that have a WEL are listed in the HSE's guidance note EH40. Exposure to substances with a WEL should be reduced as far as is reasonably practicable and should be proportionate to the health risk which the substance presents. Information about whether a substance has a WELs will be identified on the safety data sheet, and is also available on the HSE website.

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Substances which have a WEL should be used only in limited circumstances and where necessary to achieve a required outcome, where control measures can be implemented to reduce the risk to the individuals using the substance, to an acceptable level.

Health Surveillance

Health surveillance is systematic, regular and appropriate checks to detect early signs of work-related ill health among employees exposed to certain health risks. Examples include skin checks for dermatitis and lung function tests for occupational asthma.

The benefits of health surveillance include:

- Protecting employees by allowing harmful health effects to be detected at an early stage;
- Checking that control measures are working effectively and help identify if further action might be required;
- Providing data to detect and evaluate health risks;
- Providing information on the effectiveness of the controls that have been implemented;
- Providing an opportunity to train and instruct employees further in safe and healthy working practices, and
- Giving employees the chance to raise any concerns.

The type of health risk presented by a substance will determine if any health surveillance is necessary and what the nature of the surveillance should be. It may be necessary to consider the combined effects of substances encountered by individuals in a role e.g. those involved in catering whose skin is exposed to cleaning chemicals, food and flour dust may require skin monitoring for dermatitis.

Where it is identified as part of the assessment that health surveillance may be required, further advice must be obtained from the Occupational Health Unit (OHU).

4. Training and Information

All those involved in handling or using an identified hazardous substance must understand its hazards and the precautions necessary to avoid risks during its use and storage.

Academies must ensure those involved with hazardous substances:

- Are instructed on how to correctly and safely use substances and that this is updated and refreshed regularly as identified in the hazardous substances assessment.
- Are adequately supervised to ensure that the stated procedures are followed.
- Are provided with protective clothing and equipment and trained in its correct use if specified in the assessment.

5. Monitoring and reviewing these arrangements










Assessments of hazardous substances should be formally reviewed on an annual basis or more frequently where circumstances have changed. It is the responsibility of the individual Local Academy Council (LAC) to ensure that adequate monitoring arrangements exist in that Academy. The Operations Manager is responsible for reviewing Academy monitoring arrangements with the designated person.

This policy is reviewed under a yearly arrangement.

6. The meaning of hazardous substances

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The meaning of the hazardous substances detailed in section two of this document are provided below:

What do the COSHH symbols mean?		
 Dangerous to the environment	 Toxic	 Gas under pressure
 Corrosive	 Explosive	 Flammable
 Caution – used for less serious health hazards like skin irritation	 Oxidising	 Longer term health hazards such as carcinogenicity

7. Appendices

- Appendix One – Register of Substances Template
- Appendix Two – COSHH Assessment Template
- Appendix Three – Biological Substances Assessment Template

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5. Risk rating

Identify the level of toxicity of the substance across the top of the table, then identify the exposure level (side of table) and work across the table to meet the level of toxicity identified. This is the risk rating. Exposure is the level of the substance to which people are exposed. Frequency of use and entry routes must be considered to determine the level of exposure.

		Risk of process/substance		
Toxicity →		Low – Corrosive, irritant, harmful, Category 1 pathogen	Toxic – toxic, assigned WEL, category 3 pathogen	Very toxic – very toxic, carcinogens, sensitisers, assigned a WEL cat 3 or 4 pathogen
Exposure →	High	Medium	High	High
	Significant	Low	Medium	High
	Limited	Low	Low	Medium

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Risk rating	Description	Action Priority
High	Exposure is likely or very likely resulting in serious health effects.	Urgent action required to reduce the risk
Medium	Exposure is possible and could result in harm to health	Medium
Low	Exposure is limited and potential risk to health low where control measures are in place.	Low priority.

6. Workplace Exposure Limit (WEL). Where workplace exposure limits are in place for a substance it may be necessary to undertake monitoring to ensure the limits are not exceeded.

Substance	WEL	What monitoring of actual exposure is required? Attach plan for monitoring.

7. Training and instruction

What training and instruction is required?	Who requires training?(groups or individuals where necessary)	Frequency of training

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8. Health Surveillance

It may be necessary to discuss the nature and frequency of Health Surveillance with the Occupational Health Unit

What health surveillance is necessary?	Who will carry out health surveillance?	Frequency of surveillance?

9. Additional Hazards

Tick if any substance assessed impacts any of the areas below:

Manual Handling	Fire	Individual person such as Young Person, New/ Expectant Mother or Service User

If any are ticked a specific risk assessment must be completed for that hazard.

10. Further Action - Indicate any additional action required to reduce/eliminate risk and time scale for implementation

11. Assessment

Signature of Assessor	Date assessed	Methods of communication	Date of communication

Review

Date	Reviewed by	Action required	Method of communication	Date of communication

12. Communication and Review

This assessment should be communicated to all employees and relevant persons who may come into contact with the substances/process being assessed. The Safety Data Sheet must be readily available to those involved in the process or using the substance.

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Appendix Three

Biological Substances Risk Assessment

1 Activity / role to be assessed		2 Date of risk assessment	
3 Person undertaking assessment		4 Location of assessment	

Substance	Frequency of exposure	Hazard including exposure routes	What is the potential harm & to whom?	Current controls	What's the risk rating? See note 5	Further action to reduce risk
1						
2						
3						

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5. Risk rating

Identify the level of toxicity of the substance across the top of the table, then identify the exposure level (side of table) and work across the table to meet the level of toxicity identified. This is the risk rating. Exposure is the level of the substance to which people are exposed. Frequency of contact and entry routes must be considered to determine the level of exposure.

		Risk of process/substance		
		Low – Corrosive, irritant, harmful, Category 1 pathogen	Toxic – toxic, assigned WEL, category 3 pathogen	Very toxic – very toxic, carcinogens, sensitisers, assigned a WEL, cat 3 or 4 pathogen
Exposure →	High	Medium	High	High
	Significant	Low	Medium	High
	Limited	Low	Low	Medium

Risk rating	Description	Action Priority
High	Exposure is likely or very likely resulting in serious health effects.	Urgent action required to reduce the risk
Medium	Exposure is possible and could result in harm to health	Medium
Low	Exposure is limited and potential risk to health low where control measures are in place.	Low priority.

6. Health Surveillance

It may be necessary to discuss the nature and frequency of Health Surveillance with the Occupational Health Unit

What health surveillance is necessary?	Who will carry out health surveillance?	Frequency of surveillance?

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7. Training and instruction

What training and instruction is required?	Who requires training?(groups or individuals where necessary)	Frequency of training

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8. Further Action - Indicate any additional action required to reduce/eliminate risk and time scale for implementation

9. Assessment

Signature of assessor		Date assessed	
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Date of review	Reviewed by	Any action

10. Communication and Review

This assessment should be communicated to all employees and relevant persons who may come into contact with the substances/process being assessed. The assessment must be reviewed at least every 5 years or where circumstances change.