



Transforming Lives

EDUCATIONAL TRUST

**Control of  
Substances  
Hazardous to  
Health Policy**

**September 2023**



# Version Control

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## 1 – The TLET Way

Transforming Lives Educational Trust (TLET/The Trust) is a family of academies. Every TLET policy is rooted in and reflects our ambitions for pupils, students and wider stakeholders alike.

### OUR AMBITIONS -

**As a Trust family, our shared ambitions drive everything we do, we call this ‘The TLET Way’.**

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Through the transformative values of courage, kindness and loyalty, together we:



#### NURTURE POTENTIAL

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We flourish in the places we create together.



#### INSPIRE COMMUNITY

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We champion each other to make a difference.



#### DELIVER EXCELLENCE

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We strive to achieve our best.



## 2 – Definition of Terms

- 2.1 **Hazardous substance**, for the purposes of this policy, refers to a substance which may cause ill health if inhaled, ingested, injected or absorbed through the skin or as a result of being released into the surrounding environment.
- 2.2 **Exposure**, for the purposes of this policy, refers to an instance in which people have contact with a chemical, either directly or through another substance contaminated with a chemical.
- 2.3 **COSHH Assessment**, for the purposes of this policy, refers to an assessment carried out on anything that is considered to be hazardous to health (see **Appendix 1** for a COSHH Assessment Form template).
- 2.4 **PPE**, for the purposes of this policy, refers to clothing or equipment that is worn or used in order to provide protection against hazardous substances or environments.
- 2.5 **Material Safety Data Sheet (MSDS)**, for the purposes of this policy, refers to a document which provides important health and safety information regarding a substance. This is provided by the supplier or manufacturer and indicates whether a substance is classified as hazardous.

## 3 – Rationale and Statutory Requirements

- 3.1 This policy covers risk assessment, recording and storage of chemicals that fall under Control of Substances Hazardous to Health (COSHH).

## 4 – Scope

This policy refers to:

Parents/Carers		Trustees	✓
Employees	✓	Volunteers	✓
Pupils/Students	✓	Visitors	✓
Governors	✓	Community	

### 4.1 Roles & Responsibilities

#### 4.1.1 The TLET Director of Operations (DoO) is responsible for:

- Producing, and annually reviewing, a Trust-wide COSHH Policy for distribution to the Trust's academies;
- Producing a template COSHH Assessment to be used within the Trusts academies;

#### 4.1.2 The Trust Facilities Officer is responsible for:

- Ensuring that Site Team and Cleaning staff are COSHH trained;

- Ensuring that those involved in the COSHH have an appropriate understanding, keep training up-to-date and remain competent to perform their role;
- Ensuring all Site Team and Cleaning staff are aware of COSHH procedures (as detailed in **paragraph 6**);
- Ensuring all Site Team and Cleaning staff COSHH assessments are completed and appropriate measures are put in place.

4.1.3 **The Local Governing Board** is responsible for:

- all health and safety matters in the academy. However, the LG Board delegates operational matters and day-to-day tasks to the academy Principal.

4.1.4 **The Academy Principal** is responsible for:

- the implementation of this policy, including:
  - ensuring that appropriate academy staff (such as those who work in high-risk environments such as Science and Design Technology departments) are COSHH trained;
  - ensuring that those involved in the COSHH (such as those who work in high-risk environments such as Science and Design Technology departments) have an appropriate understanding, keep training up-to-date and remain competent to perform their role;
  - ensuring all staff are aware of COSHH procedures (as detailed in **paragraph 6**);
  - ensuring appropriate COSHH assessments are completed and appropriate measures are put in place.

4.1.5 **Academy and Central Services staff** are responsible for:

- ensuring they follow COSHH procedures (as detailed in **paragraph 6**);
- informing the academy Principal or their manager of any specific COSHH concerns;
- informing the academy Principal of any new hazardous substances coming to site.

4.1.6 **Contractors** are responsible for:

- informing Site Team staff if any substances hazardous to health, including by-products, will be used in, or produced as a result of, works carried out.

## 5 – Principles

- 5.1 In categorising what substances with the potential to be hazardous to health are introduced to the Trust estate and where they are used, worked on, handled or stored, the Trust recognises that no substance can be considered completely safe.
- 5.2 In categorising what substances have the potential to become hazardous to health, the Trust recognises that products such as waste, fumes or dust may be produced during processes that may take place on any Trust site.
- 5.3 In categorising what substances with the potential to be, or to become, hazardous to health, the Trust recognises the different means of transportation, collection, storage, weighing, pouring, packing, discharge and disposal used at any Trust site.

- 5.4 In recognising the matters detailed in **paragraphs 3.1 – 3.3**, the Trust will use this policy to assist in identifying hazards and devising preventative, mitigating and controlling actions, where possible, using risk assessments, training and personal protective equipment (**PPE**), where applicable.
- 5.5 Substances hazardous to health, as defined by the [Health and Safety Executive \(HSE\)](#) include but are not limited to:
- Chemicals, and products containing chemicals;
  - Dusts;
  - Fumes;
  - Gases, and asphyxiating gases;
  - Mists;
  - Vapours;
- 5.6 Substances hazardous to health, as defined by the HSE, do not include:
- Asbestos (see the **TLET Health and Safety Policy**);
  - Lead;
  - Radioactive substances.
- 5.7 This policy is based on the following legislation:
- [The Health and Safety at Work Act 1974](#), which sets out the general duties employers have towards employees;
  - [The Environmental Protection Act 1990](#), which defines, within England, Wales and Scotland, the structure and authority for waste management and control of emissions into the environment;
  - [The Management of Health and Safety at Work Regulations 1992](#), which require employers to make an assessment of the risk to the health and safety of their employees;
  - [The Management of Health and Safety at Work Regulations 1999](#), which require employers to carry out and implement risk assessments, and provide appropriate information and training to employees;
  - [The Control of Substances Hazardous to Health Regulations 2002](#), which require employers to control substances that are hazardous to health;
  - [The Control of Substances to Hazardous to Health Regulations 2003](#) and [The Control of Substances Hazardous to Health Regulations 2004](#), which develop upon the 2002 regulations;
  - [The Hazardous Waste Regulations, England and Wales 2005](#), which set out the regime for the control and tracking of hazardous waste in England and Wales;
  - [The Controlled Waste Regulations, England and Wales, 2012](#) (and subsequent [amendment](#)), which state that household, industrial and commercial waste are classed as controlled waste and are subject to [The Environmental Protection Act 1990](#).



## 6 – Policy Statement

6.1 The Trust's Control of Substances Hazardous to Health Policy is designed to:

- Ensure the health and safety of all staff, pupils and visitors at all TLET sites at all times;
- Ensure academy staff and Local Governing Boards are aware of their responsibilities with regards to health and safety at their academy site/s;
- Ensure academy staff and Local Governing Boards are aware of their responsibilities with regards to health and safety when engaged in activities involving chemicals, products containing chemicals, fumes, dusts, vapours, mists, gases and some biological agents.

## 7 – Procedure

7.1 In order to prevent and control the exposure of staff, pupils and visitors to hazardous substances, suitable and sufficient COSHH Assessments and Risk Assessments will be carried out by the relevant Head of Department, or responsible technician, on hazardous substances before use.

7.2 MSDS will be stored in a COSHH folder held by each relevant department and will be used by the relevant Head of Department, or responsible technician, to complete a COSHH Assessment (see **Appendix 1** for a COSHH Assessment Form template).

7.3 Following a COSHH Assessment being completed, a Risk Assessment will be completed by the relevant Head of Department or responsible technician, before any substance hazardous to health is used.

7.4 The Risk Assessment will be updated by the responsible member of staff when changes to usage procedure occur, and will be regularly reviewed in order to ensure that the controls used are necessary, effective and adhered to.

7.5 Risk Assessments will be shared with all relevant people, including pupils where relevant, and its control measures actioned and followed, including, where necessary the wearing of PPE.

7.6 Staff, and pupils, will ensure that they are familiar with COSHH procedures and any relevant Risk Assessments, before using any hazardous substances.

7.7 Staff will provide instruction, information and training on the use of hazardous substances to pupils and visitors.

7.8 The relevant Head of Department, or responsible technician, will ensure that hazardous substances will be appropriately labelled including the relevant COSHH symbols.

7.9 The relevant Head of Department, or responsible technician, will ensure that hazardous substances will be stored according to manufacturer's guidelines.

7.10 The relevant Head of Department, or responsible technician, will ensure that hazardous substances will be disposed of according to manufacturer's guidelines.

- 7.11 Training will be given to those whose work directly involves working with hazardous substances (for more details, see **paragraph 7**).
- 7.12 Contractors will inform Site Team staff if any substances hazardous to health, including by-products, will be used in, or produced as a result of, works carried out.

## 8 – Recording and Reporting

### 8.1 Academy First Aid and accident records

- 8.1.1 An accident form will be completed by the First Aider, Mental Health First Aider or Paediatric First Aider/ relevant member of staff on the same day or as soon as possible after an incident resulting in an injury due to using COSHH materials.
- 8.1.2 As much detail as possible should be supplied when reporting an accident, including all of the information included in the accident form.
- 8.1.3 Records held in the First Aid and accident book will be retained by the academy for a minimum of 3 years, in accordance with regulation 25 of [The Social Security \(Claims and Payments\) Regulations 1979](#), and then securely disposed of.

### 8.2 Reporting to the DoO

- 8.2.1 As part of the termly Health and Safety meeting with representatives of the academy, First Aid data will be reported to the Trust's DoO.
- 8.2.2 As part of the termly Health and Safety meeting a representative from Site (including cleaning), Science and Design Tech departments will attend and give feedback on any necessary COSHH related items.
- 8.2.3 Additional reports will be submitted to the DoO if it is necessary for the academy to submit a RIDDOR report to the HSE (see **paragraph 7.3**).

### 8.3 Reporting to the HSE

- 8.3.1 The **Pupil Experience Leader leading on First Aid** will keep a record of any accident which results in a reportable injury, disease, or dangerous occurrence as defined in regulations 4, 5, 6 and 7 of [The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 \(RIDDOR\)](#).
- 8.3.2 Reportable injuries, diseases or dangerous occurrences include, but are not limited to:
- Death;
  - Specified injuries, which are:
    - fractures, other than to fingers, thumbs and toes;
    - amputations;
    - any injury likely to lead to permanent loss of sight or reduction in sight;

- any crush injury to the head or torso causing damage to the brain or internal organs;
  - serious burns (including scalding);
  - any scalping requiring hospital treatment;
  - any loss of consciousness caused by head injury or asphyxia;
  - any other injury arising from working in an enclosed space which leads to hypothermia or heat-induced illness, or requires resuscitation or admittance to hospital for more than 24 hours;
- Injuries where an employee is away from work or unable to perform their normal work duties for more than 7 consecutive days (not including the day of the incident);
  - Where an accident leads to someone being taken to hospital
  - Near-miss events that do not result in an injury, but could have done. Examples of near-miss events relevant to academies include, but are not limited to:
    - the collapse or failure of load-bearing parts of lifts and lifting equipment;
    - the accidental release of a biological agent likely to cause severe human illness;
    - the accidental release or escape of any substance that may cause a serious injury or damage to health;
    - an electrical short circuit or overload causing a fire or explosion.

8.3.3 The **Principal** will report these to the HSE as soon as is reasonably practicable and in any event within 10 days of the incident.

8.3.4 HSE guidance on Incident Reporting in Schools (Accidents, Diseases and Dangerous Occurrences) can be found [here](#).

8.3.5 HSE guidance on how to make a RIDDOR report is available [here](#).

## 8.5 Reporting to child protection agencies

8.5.1 The **Vice Principal, Behaviour and Safety** will also notify **Warwickshire Front Door** of any serious accident or injury to, or the death of, a pupil while in the academy's care.

## 9 - Training

9.1 COSHH training will be provided to relevant staff, such as cleaning staff, Design Technology staff, Science staff and Site Service staff.

9.2 COSHH training is mandatory for those working with substances hazardous to health.

9.3 COSHH training will be organised and recorded by the relevant Head of Department.

9.4 COSHH training will be renewed on an annual basis.

## 10 – Monitoring

- 10.1 It is the responsibility of the Trust Board and those to whom it delegates the authority, to ensure that the principles and procedures of this policy are adhered to. The use of this policy will be subject to routine monitoring to ensure its fidelity in practice. The evidence gathered from monitoring shall inform any reviews and future revisions to the policy, which will be carried out at regular intervals and no later than as stated on Page 2 of this policy.

## 11 – Related Documents

TLET Health and Safety Policy

[The Health and Safety at Work Act 1974](#)

[The Environmental Protection Act 1990](#)

[The Management of Health and Safety at Work Regulations 1992](#)

[The Management of Health and Safety at Work Regulations 1999](#)

[The Control of Substances Hazardous to Health Regulations 2003](#)

[The Control of Substances Hazardous to Health Regulations 2004](#)


[The Hazardous Waste Regulations, England and Wales 2005](#)

[The Controlled Waste Regulations, England and Wales, 2012](#)

[EH40/2005 Workplace Exposure Limits \(HSE\)](#)

[Working with Substances Hazardous to Health \(HSE\)](#)

## Appendix 1 – COSHH Assessment Template

Trade Name / Substance	
Manufacturer Details	
Unit Size	
Physical State & Colour	
Area / Process where used	
Personnel Likely to be Effected	
PPE requirements	
Safety Notices	
Safe Storage Considerations	
Categories of danger: (Tick below as appropriate)	
	
<p>Toxic      Gas under Pressure      Harmful/Irritant      Explosive      Harmful to environment      Oxidising      Longer term health hazards      Corrosive      Flammable</p>	
Harmful exposure routes (Tick below as appropriate)	
Inhalation	<input type="checkbox"/>
Skin Contact	<input type="checkbox"/>
Ingestion	<input type="checkbox"/>
Skin Absorption	<input type="checkbox"/>
Eye contact	<input type="checkbox"/>
Injection / Sharps	<input type="checkbox"/>
First Aid Requirements	
Health Surveillance	
Fire Safety Considerations	
Environmental Considerations	
Workplace Exposure Limits	
Stability / Reactivity	
Current methods of Control	
Elimination / Substitution	
MSDS Received?	
Version Number/Date	

Spillage Procedures	
Safe Disposal Method	

Assessed by (Name)						
Year assessed						
Re-assessment by end*						
Assessment still applicable? Yes / No*						

\* Add 1 year from the year assessed.

\*\* If "No" put a line through this sheet and write superseded or no longer used next to it.

**FURTHER ACTION REQUIRED**

Action	Responsible	Agreed by / Date	Priority / Due Date	Transferred to H&S Action Sheet

**COMMENTS**