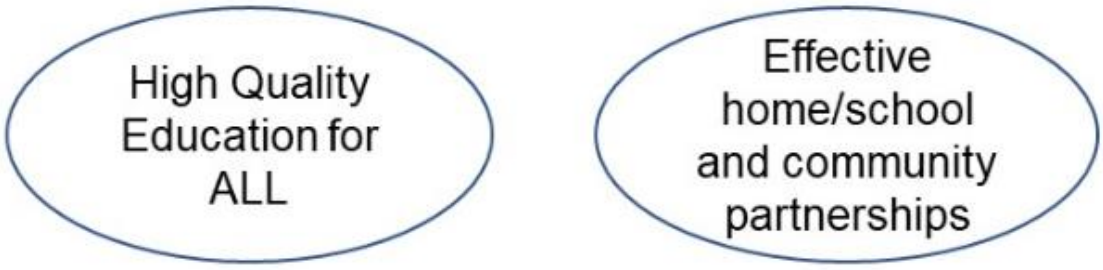
Control of Substances Hazard to Health (COSHH) Policy

Our Shared Vision

Striving for excellence in everything we do



Equality Mission Statement

We are committed to ensuring equality of educational opportunity and support for all pupils, parents, carers, staff and visitors irrespective of age, sex, race, disability, religion or belief, sexual orientation, pregnancy, gender reassignment, and socio-economic background. We aim to provide a fully inclusive school in which every person feels proud of their identity and is able to participate fully within the school community. We believe that a diverse school community is a strength which should be respected and celebrated by all those who learn, teach and visit here.

Approved by: Estate & Financial Management Committee	**Date:**
Signature (Chair of Governors):	**Signature (Headteacher):**
Created: November 2026	**Review date:** November 2027

A copy of this policy can be found on the school website and a signed copy held on file

This policy covers many of the articles from the UN Convention on the Rights of the Child. Some key ones are listed below.

Article 3 Best Interests of the Child

The best interests of the child must be a top priority in all decisions and actions that affect the child.

Article 6 Life, Survival and Development

Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential.

Article 24 Health and Health Services

Every child has the right to the best possible health.

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RATIONALE

The Governing Body of Becontree Primary School is committed to ensuring that all legal and moral responsibilities relating to the health, safety and welfare of all members of staff, pupils, subcontractors and visitors to the site are carried out effectively. This includes it's responsibilities under the Control of Substances Hazardous to Health (COSHH).

STATEMENT OF INTENT

Becontree Primary School recognises that ensuring the health and safety of staff, pupils and visitors is essential to the success of the school.

We are committed to providing a safe and healthy working and learning environment through:

a.
b. Meeting our legal responsibilities under health and safety legislation as a minimum
c. Ensuring safe working methods and providing safe work equipment.
d. Completing COSHH assessments and providing Personal Protective Equipment (PPE).
e. Providing effective information, instruction, training and supervision.
f. Monitoring and reviewing our safety arrangements and prevention measures to ensure they are effective.
g. Setting targets and objectives to develop a culture of continuous improvement.

Health and safety management procedures are adopted, and responsibilities appropriately assigned, to ensure the above commitments can be met.

What the Law says

Control of Substances Hazardous to Health 2002

Most businesses use substances, or products that are mixtures of substances. Some processes create substances. These could cause harm to employees, contractors and other people. Sometimes substances are easily recognised as harmful. As a new technology, the risks of exposure associated with nanomaterials are not currently fully understood. Whilst knowledge gaps exist, HSE recommends a precautionary approach to risk management with control strategies aiming to reduce exposure as much as possible.

The Health & Safety Executive state that a sensible approach to health and safety in schools means focusing on how the real risks are managed. Guidance will help those responsible for managing health and safety in schools to strike the right balance, so that the real risks are managed and learning opportunities are experienced to the full.

At Becontree Primary School, leaders set the direction for effective H&S management and it is an integral part of school's culture, values and performance standards.

This policy covers all aspects of COSHH, based on thorough Risk Assessment. This policy is reviewed and updated regularly, to reduce and reflect existing and new risks.

Purposes

In line with current legislation, effective leadership of COSHH is to:

1. Provide a safe and healthy environment for all who work at, visit or are educated on our site.

2. Ensure the safe use of any substance which should be covered by COSHH legislation.

3. Reduce risks, accidents and hazardous working conditions.

4. Ensuring that all policies and procedures are fit for purpose and effective.

Guidelines

Before you start your COSHH assessment, you need to:
Think about

- What do you do that involves hazardous substances?
- How can these cause harm?
- How can you reduce the risk of harm occurring?

Always try to prevent exposure at source. For example:

- Can you avoid using a hazardous substance or use a safer process – preventing exposure, e.g. using water-based rather than solvent-based products, applying by brush rather than spraying?
- Can you substitute it for something safer – e.g. swap an irritant cleaning product for something milder, or use a vacuum cleaner rather than a brush?
- Can you use a safer form, e.g. can you use a solid rather than liquid to avoid splashes or a waxy solid instead of a dry powder to avoid dust?

If you can't prevent exposure, you need to control it adequately by applying the principles of good control practice.

Control is adequate when the risk of harm is 'as low as is reasonably practicable'.

This means that:

- All control measures are in good working order.
- Exposures are below the Workplace Exposure Limit, where one exists.
- Exposure to substances that cause cancer, asthma or genetic damage is reduced to as low a level as possible.

This policy is to be read in conjunction with the following:

- Health & Safety Policy
- COSHH assessments
- Bodily Fluids Policy
- Risk assessments
- Personal Protective Equipment (PPE)
- Safer Working Practice

RESPONSIBILITIES

Staff who use COSHH substances are given the following instruction, training and support to fulfil their responsibilities in keeping themselves and others safe (in line with this policy):

- Individual job descriptions and expectations
- H&S general training, which is refreshed every 2 years (please refer to training records)
- Specific COSHH training, which is refreshed regularly
- Reminded of H&S responsibilities (general and specific) at least annually
- H&S is a standing agenda item on all staff meetings
- Messages, updates, reviews and feedback in response to monitoring or incidents
- Where a need for PPE has been identified it must be worn. Any staff member who refuses to use the PPE may be subject to disciplinary action. PPE must be kept clean and staff must report any lost or damaged PPE.

Levels of responsibility have been identified as follows:

Who?	Responsible for ensuring that:
Governing Body	a) The health and safety policy statement is clearly written, includes COSHH and it promotes a positive attitude towards safety in staff and pupils. b) The Headteacher is aware of his/her health and safety responsibilities and has sufficient experience, knowledge and training to perform the tasks required.
Estate & Financial Management Committee (Chair – Mr Richard Puttnam)	a) Clear procedures are created to assess any significant risks and ensure that safe working practices are adopted. b) Sufficient funds are set aside with which to operate safe working practices. c) Health and safety performance is monitored, failures in health & safety policy or implementation recognized, and policy and procedure revised as necessary. d) Attends at least one H&S walkabout meeting per year and follows-up on actions required from above meetings during strategic monitoring visits.
Headteacher (Mrs Marie Ziane)	Reporting to the Governing Body, the Headteacher has the overall responsibility for ensuring that the Health and Safety Policy (including safeguarding and online safety) is effectively implemented and that proper resources are made available in order to achieve this. a) She plans ahead as necessary to make human, financial and other resources available to secure a high standard of health and safety management, taking competent advice on matters of health and safety where relevant. b) The school's Health and Safety Policy and the application of the health and safety procedures and arrangements are applied.

	c) She provides the final authority on matters concerning health and safety at work. d) Decisions made on health and safety issues are based on a proper assessment of any risks to health and safety, and will ensure the control of those risks in an appropriate manner. e) She delegates specific responsibility for the implementation and monitoring of the Health and Safety Policy to Mrs P. Thornton, the Strategic Business Lead. f) Where the need for PPE has been identified in Risk Assessments, adequate supplies of suitable PPE are provided. g) Potential hazards are identified and that risk assessments are completed for all significant risks in the school.
Strategic Business Lead (Mrs P. Thornton) ***Day-to-day responsibility for health and safety***	a) She completes relevant training; including COSHH assessment training b) She provides an annual report to Governors on Health & Safety c) She reviews and completes COSHH assessments for any substance categorized as hazardous and ensures that relevant staff and are aware d) Any PPE identified is purchased, available and in good condition e) She records issue of PPE to staff f) The use of COSHH substances and PPE (where required) is monitored g) Any concerns are reported to the Headteacher promptly
Site Manager (Mr Mark Allen) ***Deputises for the SBL in H&S matters***	a) He completes relevant training; including COSHH assessment training b) He provides Data sheets for new/updated COSHH substances to SBL for COSHH assessment are provided c) COSHH assessments are reviewed to ensure they are up to date d) He controls the Hazardous Substances locked storage and ensures that only small amounts are in use at any one time e) The use of, dilution and decanting of any COSHH substances is supervised f) The use of COSHH substances and PPE (as required) is monitored g) Excess COSHH substances or containers are disposed of safely h) Stock levels of PPE used by site staff are controlled i) Concerns are reported to the SBL or Headteacher
Other Site staff	a) They complete COSHH training and update regularly b) They understand and demonstrate safe use of COSHH substances c) They use PPE identified correctly and advise if lost or needs replacement d) Excess COSHH substances or containers are disposed of safely e) Any concerns are reported to the Site Manager or SBL

ARRANGEMENTS

COSHH Assessments

A Data sheet (or similar) is collected for each substance and a COSHH assessment completed for all substances which fall under this category. The assessment covers storage, First Aid precautions, Personal Protective Equipment (PPE) and disposal. Completed COSHH assessments are circulated after each review and records kept.

COSHH assessments can be found in a file in the office of the Strategic Business Lead. COSHH Assessments are reviewed regularly (at least once every 2 years or if a change has been made) and are then circulated to all site staff. A copy of the COSHH assessments can also be found in each cleaning cupboard.

Cleaning staff must read the manufacturers' instructions carefully on usage, in addition to procedures for dealing with spillages and accidents, all of which are noted in the COSHH Assessments.

A sample COSHH Assessment is recorded in Appendix A.

Storage

All hazardous substances (including cleaning materials) that require a COSHH Assessment should be locked away, either in the COSHH cupboard or Flammables cabinet in the Site Managers Office or in a locked cupboard in the cleaners' storerooms. Keys are restricted to the Site Manager and cleaners only, although the SBL has access in an emergency.

Children are not permitted to enter the Site Manager's or the cleaners' rooms. The cleaners' rooms must be kept locked when not in use.

Safety notices and instructions for handling materials, dealing with spillages and accidents, and for operating equipment are produced.

Personal Protective Equipment (PPE)

Adequate PPE is provided and used where necessary. Disposable PPE is used just once and discarded. PPE that is issued to a staff member is signed for. See Appendix B.

Flammable substances

These are kept in a locked, metal cabinet in the Site Manager's store. The key will remain with the Site Manager.

Accidents/First Aid

In the event of an accident, immediate first aid will be administered. Instructions on the container will be followed, but school policy is to get the injured person to casualty as quickly as possible, unless the accident is exceptionally minor. The container must always be taken to the hospital with the injured party. An accident/incident report will be completed, including for cases of a Near Miss.

Hazardous substances (used by teachers and children) which do not usually require a COSHH Assessment

1. Batteries (stored in curriculum resource cupboard)

If these are dismantled as part of an experiment this must be done only by the class teacher and after checking on all safety issues. Generally, this activity should be avoided except possibly with the oldest children as part of their science work on electricity.

2. Felt pens.
All felt pens purchased for use by the children are water based. However, some children bring felt pens from home which may be spirit based. Care must be taken that children do not 'sniff' such pens. Permanent marker pens that are spirit based must only be used by adults.

3. Tipp-ex.
This must be used only by adults. However, there is a water-based correction fluid which may be used by children (if the teacher wishes) so read the instructions carefully.

3. Photocopy/printer toner.
Toner is generally no longer hazardous. The instructions on the packaging should be followed. Plastic gloves are available if required. The old cartridge must be disposed of responsibly. There is a recycling box at the school office.

Specific Hazardous substances

1. Petroleum based glues.
These are not purchased as part of school stock. Staff and children must not be allowed to bring in/use such glues.

If the Site Manager should require such glues, then these must be stored in the COSHH cabinet and a COSHH assessment completed.

2. Fixatives, spray paints and varnish
These must be stored by Site Manager and used only by adults, who have signed the COSHH assessment. They should be used in a well-ventilated area (preferably outside).

3. White Spirit/Turpentine.
This is stored by the Site Manager to clean oil-based paints off brushes. It is locked in the COSHH cabinet. It must be used only by adults who have read and signed the COSHH assessment.

MONITORING

External Health & Safety Inspections, Audits and Advice

The school completes the following regular inspections and audits (relating to COSHH health & safety):

- Local Authority Health & Safety Audit (usually every 3 years)

The school continually responds to in-school monitoring activities and incidents, external audit recommendations and any changes to national or local guidance.

In-school monitoring

We have accountability structures in place for the consistent monitoring and reporting of Health & Safety related matters. We complete the following pro-active monitoring checks:

- Link Governor monitoring visits (termly)
- Cleaning walks (at least termly)
- H&S walkabouts (at least termly)
- Meetings with Site Manager (monthly)
- Site checks by Site Manager (daily & weekly)
- Cycle of review for policies/procedures (see policy overview)
- Responses to issues raised e.g. accident/incidents, staff/parent concerns (as required)
- Targets and objectives set to continually improve processes

Reporting and accountability

Key aspects of H&S are reported to Site & Financial Management Committee and the Full Governing Body on a termly basis and include:

- Results of key audits and inspections
- Accidents/Incidents
- Near-misses
- Staff absences

Appendix A
Sample COSHH Assessment (example)

Becontree Primary School

JUDICIUM & EDUCATION

COSHH ASSESSMENT

This assessment ***only addresses the risk of harm to health*** from the substances listed. Additional risk assessments may be required to control the risk from other hazards associated with this work/the procedures used.	
ASSESSOR (print) Paula Thornton	**Title** (print) SBL
HAZARDS IDENTIFIED	
Substance *(Name of Chemical/Product)*	*Air Freshener (Charm, etc)*
Hazardous Properties *(Provide details of how the substance could cause harm, e.g. harmful by inhalation, skin contact, flammable, carcinogen, allergen, etc.)*	Irritation to eyes, skin and by inhalation. Harmful if ingested. **EXTREMELY FLAMMABLE – PRESSURISED CONTAINER**
What will the chemical be used for?	Spraying areas with bad smells (eg toilet)
Who may be exposed?	All staff but mainly cleaners/ Site Manager
Additional information: **KEEP OUT OF REACH OF CHILDREN** ***EXTREMELY FLAMMABLE – PRESSURISED CONTAINER*** **KEEP AT TEMPERATURE NOT EXCEEDING 50°. PROTECT FROM SUNLIGHT.** **INTENTIONAL MISUSE BY DELIBERATELY INHALING CONTENTS CAN BE HARMFUL OR FATAL**	
Emergency Procedures (details found on MSDS or packaging) • Eye contact: IRRIGATE WITH WATER FOR AT LEAST 15 MINUTES • Inhalation: REMOVE TO FRESH AIR AND REST. IF BREATHING HAS STOPPED ADMINISTER ARTIFICIAL RESPIRATION AND OBTAIN MEDICAL ATTENTION. • Skin contact: WASH WITH SOAP/CLEANSER AND RINSE WITH PLENTY OF WATER • Ingestion: DO NOT INDUCE VOMITING AND GIVE PLENTY OF WATER IN SIPS, SEEK MEDICAL ATTNETION ***IF IRRITATION PERSISTS THEN CONSULT A DOCTOR*** • Spill procedure: see disposal below	

Becontree Primary School

JUDICIUM & EDUCATION

COSHH ASSESSMENT

METHODS OF PREVENTION OR CONTROL OF EXPOSURE (select all that apply by circling/ticking/highlighting the appropriate statement)			
Engineering controls	**Access Control**	**Special Procedures**	**Approved PPE**
~~total containment~~ ~~fume cupboard~~ ~~local exhaust ventilation~~ ~~blast screen~~	~~restricted to competent personnel~~ ~~special containment facility (give specific area)~~	~~Standard Operating Procedure (SOP) required~~ ~~Code of practice, local rules, etc~~	~~gloves etc (any, cover skin)~~ ~~eye protection (goggles if contact likely)~~ ~~laboratory coat/overalls (specify type)~~ ~~other PPE (specify)~~

Disposal Procedures
Absorb with inert material. Ensure adequate ventilation. Remove sources of ignition. Do not pierce or burn even after use. Dispose according to national and local authority guidelines.
TRAINING REQUIREMENTS
None
HANDLING AND STORAGE REQUIREMENTS
Keep away from sources of ignition. Do not smoke while using. – see emergency procedures above
ASSESSMENT OF RISK USING CONTROLS DETAILED ABOVE *(Are the hazards/risks suitably controlled, using the control measures detailed above? If not, state the further actions required)* **YES**

Action completed by	Paula Thornton
Signature	
Date	4/7/2022
Review date	4/7/2024

Appendix B
Record of PPE issued (example)

Personal Protective Equipment (PPE) Record

Staff who require PPE on a regular basis should sign when issued.

Items not included:
* Disposable gloves (for all staff, particularly First Aiders)
* Items in spillage kit (Disposable gloves, aprons and reuseable goggles)
* Reuseable household gloves (for cleaners) - given periodically as required

MDA (name):

PPE	How many given?	Why?	Safe System of Work received	Confirmation (date)	Confirmation (signed)
Tabards	1	protection from spills/splashes	YES / NO		
Hi-Vis Jacket	1	visibility	YES / NO		

MDA (name):

PPE	How many given?	Why?	Safe System of Work received	Confirmation (date)	Confirmation (signed)
Tabards	1	protection from spills/splashes	YES / NO		
Hi-Vis Jacket	1	visibility	YES / NO		

MDA (name):

PPE	How many given?	Why?	Safe System of Work received	Confirmation (date)	Confirmation (signed)
Tabards	1	protection from spills/splashes	YES / NO		
Hi-Vis Jacket	1	visibility	YES / NO		