

Torbay Council Occupational Health and Safety (OHS)  
Management System

Control of Substances Hazardous to Health (COSHH)  
Policy

Adopted by Watcombe Primary School Autumn 2022

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<b>Document Author:</b>	Giles Watson
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## Version control

Date	Details	Updated by
1 <sup>st</sup> June 2021	New Policy to meet legal Requirements.	Corporate Health and Safety Officer
1 <sup>st</sup> September 2021	Hyperlinks updated.	Corporate Health and Safety Officer
23 <sup>rd</sup> May 2022	Policy review / update with minor amendments.	Corporate Health and Safety Officer

In consultation with and date:

Health and Safety Team	26 <sup>th</sup> May 2022
Human Recourses Department	26 <sup>th</sup> May 2022
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Joint Consultative Committee	14 <sup>th</sup> June 2022
Health and Safety Working Group	25 <sup>th</sup> July 2022

## Aim

Torbay Council & Watcombe Primary School (hereafter referred to as TC & WPS) are committed to providing and maintaining a safe working environment, safe equipment and systems of work for all employees and contractors. TC & WPS recognises that people in the workplace may be exposed to substances that have the potential to damage their health. These are called “hazardous substances”.

## Objectives

This policy is based on the Control of Substances Hazardous to Health Regulations 2002 (as amended), known as COSHH, and the Control of Substances Hazardous to Health (Amendment) Regulations 2004 (both hereafter referred to as “the Regulations”) and supports the TC & WPS Health & Safety Policy. The Regulations apply both to employees and all persons who may be affected by TCs work activities.

This policy is designed to support TC & WPS in complying with its duties regarding the Regulations, under which it must act to reduce the likelihood of work-related illness and diseases in the workplace. To achieve this, TC & WPS is required to:

- Undertake a suitable and sufficient assessment of the risks to health arising from work activities associated with hazardous substances.
- Ensure that exposure to hazardous substances is prevented, or, if this is not possible, introduce adequate control measures to reduce exposure.
- Maintain those control measures and any equipment associated with them.
- Monitor the effectiveness of the control measures and, if necessary, the health of employees.

## Definitions

Substances hazardous to health – Includes any material, mixture or compound used at work or arising from work activities, which is harmful to people’s health in the form in which it occurs in the work activity. Substances can take many forms and include:

- Chemicals.
- Products containing chemicals.
- Fumes.
- Dusts.
- Vapours.
- Mists.
- Nanotechnology.
- Gases and asphyxiating gases.
- Biological / Bacterial agents (germs).
- Germs that cause diseases such as leptospirosis, legionnaire’s disease and coronavirus (COVID-19).
- If the product / chemical packaging has any COSHH hazard symbols then it is classed as a hazardous substance:



- Hazardous substances and / or by-products of processes may be produced as a result from certain work activities e.g. wood dust or welding fume.

Workplace Exposure Limits (WEL) – Unless otherwise stated in the Guidance Note EH40 (Health and Safety Executive, 2020), relates to personal exposure to substances hazardous to health in the air of the workplace, based on a long-term (8- hour TWA (Time Weighted Average)) exposure limit and/or a short-term exposure limit (usually 15 minutes).

The Regulations - Apply to all relevant substances from the time of receipt onto premises to their internal transportation, storage, use of and disposal.

## Managing Substances Hazardous to Health

### COSHH Assessment:

All hazardous substances / chemicals used or generated by TC & WPS shall be subject to a COSHH assessment.

Exceptions to the Regulations include:

- Where the Control of Lead at Work Regulations 2002 and the Control of Asbestos Regulations 2012 apply.
- Where the substance is hazardous solely because of its radioactivity, flammability, explosive properties or its conditions of storage, such as high or low temperature or high pressure. Since, for such substances, the risk is to safety rather than health, COSHH Assessments are not required, but risk assessments (e.g. in accordance with The Dangerous Substances and Explosive Atmospheres Regulations 2002) should be undertaken to determine how the risks associated with these substances may be minimised.

A COSHH assessment (see Appendix 1 Example COSHH Assessment), available on Assure-Risk-COSHH Activity Assessment, is an assessment of how substances used in the workplace could potentially damage the health of employees and others and shall determine the appropriate control measures to prevent, reduce or adequately control the exposure of all personnel to the harmful effects of hazardous substances.

Under the Regulations, the COSHH assessment must be 'suitable and sufficient', i.e., the detail and expertise with which it is carried out should be commensurate with the nature and degree of risk arising from the work, as well as the complexity and variability of the process.

The Headteacher & SBM shall ensure that:

- All hazardous substances / chemicals used by WPS are identified and inventoried.
- Reduce the quantity and ensure only required COSHH products are stored on site.

- Manufacturer Safety Data Sheets (SDS) for all hazardous substances used by the organisation shall be obtained from suppliers and the information recorded on the Assure module, Risk-Safety Data Sheet.
- A comprehensive risk assessment of the processes involving the use of hazardous substances or those generating hazardous by-products such as dust and fumes is conducted and documented on the Assure module, Risk-COSHH Activity Assessment.
- Regular review of assessments of processes involving the use of, or contact with, hazardous substances are undertaken.
- Appropriate control measures are put into place to prevent, reduce or control the exposure of all personnel to the harmful effects of hazardous substances and by-products of processes.
- Where adequate control of exposure cannot be achieved by other means; suitable and sufficient Personal Protective Equipment (PPE) / Respiratory Protective Equipment (RPE), is provided to employees exposed to hazardous substances and materials.
- Employees are adequately trained in the use of any specialist PPE / RPE and control measures are required to monitor the correct storage and use of PPE / RPE.
- The results of COSHH assessments shall be communicated to all relevant employees and shall be kept in a location that is easily accessible.
- Appropriate information, instruction and training shall be given to employees exposed to hazardous substances and materials.
- A record shall be kept evidencing the communication of COSHH assessments, instruction and training given to relevant staff members.

## Biological / Bacterial Agents

The Headteacher & SBM shall conduct a risk assessment to assess whether their staff require the following:

- An employee brief in the risk of needle-stick injuries and the potential for infection from cuts, including contraction of blood-borne viruses such as hepatitis, and the precautions to take.
- An employee brief in the risk of exposure to, and the symptoms of biological hazards such as viruses and the precautions to take.
- An employee brief in the risk of exposure to, and the symptoms of bacterial hazards such as Tetanus and Leptospirosis and the precautions to take.
- Health monitoring / surveillance may need to be undertaken as and when identified as appropriate via the risk / COSHH assessment.
- If the manager\* determines from their risk assessment that health monitoring / surveillance is required they shall contact their HR advisor who may need to refer them to Occupational Health.
- If the manager\* determines from their risk assessment that vaccinations are required, they shall contact their HR advisor who may need to refer them to Occupational Health.
- Any needle stick injuries shall be reported on the TC Assure Accident, Report an Employee Accident.
- The risk assessment shall identify if there is a requirement to contact the Occupational Health Department or a local hospital to arrange vaccinations following a needle stick injury.

\*COSHH assessments shall only be undertaken by suitably trained and competent employees who have sufficient training (L3 Equivalent H&S training or the L2 COSHH course), knowledge,

skills and expertise to perform an assessment effectively. The assessor may be supported by one or more staff member having skills, knowledge and experience relevant to the risk.

## Dusts and Fumes

All processes conducted by WPS employees and contractors that result in the generation of dust or fumes shall be subject to an assessment under the Regulations.

If considered necessary, a dust / fume survey shall be undertaken in order to establish dust / fume concentrations and the requirement for additional control measures (LEV (Local Exhaust Ventilation) / RPE (Respiratory Protective Equipment) etc). Control measures to protect personnel exposed to dust and / or fumes shall be identified and put in place. All personnel likely to be exposed to dust or fumes are to be informed of the harmful effects and of the precautions and control measures to be implemented to prevent, reduce or control exposure e.g:

- Dust that is to be swept up is first damped down to reduce the potential for generation of airborne dust (Ensure that the introduction of control measures does not increase the overall risk to health and safety e.g. water on the floor creating slip, trip and falls).
- Where identified by the risk assessment, suitable PPE / RPE shall be provided to supplement other control measures. Personal protective equipment is to be worn by all personnel identified in the assessment in accordance with the training and instruction provided.

## Control Measures

Control measures shall be identified in accordance with the Regulations in order of priority:

- Identify if the hazardous substance is required or if it can be substituted for a less hazardous substance.
- The design and use of appropriate work processes, systems and engineering controls and the provision and use of suitable work equipment and materials to minimise emission, release and spread of substances hazardous to health.
- Take into account all relevant routes of exposure (see Appendix 2 Adverse Health Effects) when developing control measures.
- Control exposure by measures that are proportionate to the health risk; the control of exposure at source, including adequate ventilation systems and appropriate organisational measures.
- Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health.
- Where adequate control of exposure cannot be achieved by other means, the provision of suitable personal protective equipment in addition to the identified control measures.
- Arrangements for the safe handling, storage and transport of substances hazardous to health, and of waste containing such substances, at the workplace.
- The adoption of suitable maintenance procedures e.g. Local Exhaust Ventilation systems to be inspected and tested by a competent engineer at least every 14 months.
- Reducing, to the minimum required for the work concerned:
  - The number of people subject to exposure.
  - The level and duration of exposure.

- The quantity of substances hazardous to health present at the workplace.
- The control of the working environment, including appropriate general ventilation.
- Appropriate hygiene measures including adequate washing facilities.
- Check and review regularly all elements of control measures for their continuing effectiveness.
- Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks.
- Ensure that the introduction of control measures does not increase the overall risk to health and safety.
- Employees shall use the control measures in the way they are intended to be used and as they have been trained and instructed to do so.

## Handling and Storage

Conditions for safe storage is identified in the product SDS and shall be included in the COSHH assessment. Ensure that the storage area is suitable and that only compatible substances are stored together e.g.

- Bleach / disinfectant (chlorine) and toilet bowl cleaner (generally strong acid or ammonia).
- Oxidising agents and flammable substances.
- Drip trays may be required to contain spillages.
- Do not decant chemicals into unlabelled / unsuitable containers.
- Only mix chemicals in accordance with the manufacturer's SDS / instructions.
- Do not permit staff members to bring chemicals in from home.
- Only use / store chemicals that have a current COSHH assessment in place.

## Respiratory Protective Equipment

Where the need to wear respiratory protective equipment (RPE) is determined by the COSHH assessment; suitable and appropriate RPE with the required assigned protection factor (APF) shall be provided. Each person who is required to wear tight fitting RPE (e.g. FFP 1, 2 or 3 or half face mask) shall be clean shaven while using the RPE and must have passed a fit test for each type (make / model) of RPE worn, prior to first use and at suitable intervals thereafter, in accordance with the HSE Guidance (HSG53, 4th edition 2013, Respiratory Protective Equipment at Work – A Practical Guide).

## Spillage of Hazardous Substances

Employees and / or others may be inadvertently exposed to hazardous substances through spillage or leakage, which may cause adverse health effects (see Appendix 2 Adverse Health Effects), the COSHH assessment shall identify the control measures in the event of any spillages.

All employees working with hazardous substances must be provided with suitable and sufficient information, instruction and training regarding spillage procedures, prior to using / expose of the substance.

A spillage procedure shall be in place and communicated to relevant staff members (see Appendix 3 Example Emergency Procedure).

## Workplace Exposure Limit (WEL)

The Control of Substances Hazardous to Health (Amendment) Regulations 2004 introduced the new, single Workplace Exposure Limit (WEL).

The WEL is the airborne concentration of a substance over either an 8 hour period (long term) or a 15 minute period (short term). These limits should not be exceeded and should be reduced to as low a level as is reasonably practicable.

The substances with WELs are published in guidance note EH40 (Health and Safety Executive, 2020). This book is updated annually by the Health and Safety Executive.

The absence of a substance from the lists of WEL's does not mean it is safe; a COSHH assessment should still be undertaken to establish any necessary control measures.

In order to demonstrate that exposure to staff members is below the published WEL's, TC is responsible for ensuring provisions are in place to provide active / proactive personal air monitoring. Managers should contact the Corporate Health and Safety team for further guidance.

The use of some substances may necessitate health surveillance. If the COSHH assessment identifies the requirement for health surveillance the manager should contact their HR advisor who may need to refer them to Occupational Health.

All employees must escalate to their line manager any suspected uncontrolled presence of any potential hazardous substance related to ill health and / or unusual environmental odours that may be a cause for concern. Staff should keep a record of the presence of the odour using the form in Appendix 4 Record of Suspected Odour Problem. The completed form must be returned to their line manager.

## Policy Monitoring

Monitoring arrangements for this document shall include the Corporate Health and Safety team to conduct:

- Ad hoc review of incident data to identify any COSHH related incident trends.
- Health and Safety inspections / audits shall assist with ensuring that substances are appropriately stored.

Where a lack of compliance is found relevant information will be communicated to the relevant Director / Assistant Director or Head of Service as well as communicated at the Health and Safety Working Group, for further appropriate dissemination.

## Appendix 1 Example COSHH Assessment

### COSHH Activity Assessment Standard Report

Record Details	
Org Unit	Torbay Council -> Schools
Reference	00019
Is This Confidential	No
Project Risk Assessment Reference	
COSHH Assessment Title	Example Bleach COSHH Assessment
Location	Add Location
Team / Dept / Cost Centre	
Assessor Name	Add Name
Assessment Date	01/05/2021
Assessor Competence	Add Training e.g. IOSH Level 3
Substance	
Product Name	Domestos Bleach
Trade Name / Synonym (s)	Domestos Professional Citrus
CAS Number(s)	7681-52-9 1310-73-2
EINECS Number(s)	
Recommended Use And Restrictions On Use	General purpose cleaner. Manual process Sanitary cleaner. Manual process Surface disinfectant. Manual process
WEL	Sodium hydroxide - WEL 8hr TWA N/A, N/A / STEL - 15min - N/A, 2mg.m-3
Chemical Identity	Sodium hypochlorite Sodium hydroxide
Hazards	

COSHH Activity Assessment Standard Report

<b>Classification Type</b>	Health	
<b>Classification</b>	Skin Corrosion/Irritation	
<b>Category</b>	Category 1A	
<b>Hazard Label</b>		
<b>Signal Word</b>	Danger	
<b>Hazard Statement</b>	H314: Causes severe skin burns and eye damage	
<b>Classification Type</b>	Environmental	
<b>Classification</b>	Aquatic Toxicity (Acute)	
<b>Category</b>	Category 1	
<b>Hazard Label</b>		
<b>Signal Word</b>	Warning	
<b>Hazard Statement</b>	H400: Very toxic to aquatic life	
<b>Classification Type</b>	Environmental	
<b>Classification</b>	Aquatic Toxicity (Chronic)	
<b>Category</b>	Category 1	
<b>Hazard Label</b>		

# COSHH Activity Assessment Standard Report

<b>Signal Word</b>	Warning
<b>Hazard Statement</b>	H410: Very toxic to aquatic life with long lasting effects
<b>Tasks</b>	
<b>Activity Type &amp; Activity Description</b>	Use Added to water and used in a diluted form for cleaning/disinfecting hard surface areas.
<b>Persons At Risk &amp; How Is Person At Risk</b>	Domestic cleaning staff Inhalation of vapours may cause shortness of breath. Causes eye irritation. May cause skin irritation.
<b>Control Measures</b>	Use in ventilated area. Only used by trained staff.
<b>Potential Risk Factor</b>	2 - Minimum Risk
<b>Additional Control Measures</b>	Management to monitor use of product.
<b>Residual Risk Factor</b>	2 - Minimum Risk
<b>Quantity</b>	1 L
<b>Frequency Of Use</b>	Daily
<b>Duration Of Use</b>	1 hour
<b>Environment</b>	Open Environment
<b>Route Of Entry</b>	Contact
<b>State</b>	Liquid
<b>Approved For Use Within Area?</b>	Yes
<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <p>Eye protection must be worn</p> </div> <div style="text-align: center;">  <p>Face shields must be worn</p> </div> <div style="text-align: center;">  <p>Hand protection must be worn</p> </div> </div>	
<b>First Aid</b>	
<b>Inhalation</b>	Get medical attention or advice if you feel unwell.
<b>Seek Immediate Attention: Inhalation</b>	No

# COSHH Activity Assessment Standard Report

<b>Skin Contact</b>	Wash skin with plenty of lukewarm, gently flowing water for at least 30 minutes Take off immediately all contaminated clothing and wash it before re-use Immediately call a POISON CENTRE, doctor or physician
<b>Seek Immediate Attention: Skin Contact</b>	No
<b>Eye Contact</b>	Hold eyelids apart and flush eyes with plenty of lukewarm water for at least 15 minutes Remove contact lenses, if present and easy to do Continue rinsing Immediately call a POISON CENTRE, doctor or physician
<b>Seek Immediate Attention: Eye Contact</b>	No
<b>Ingestion</b>	Rinse mouth Immediately drink 1 glass of water Do NOT induce vomiting Keep at rest Immediately call a POISON CENTRE, doctor or physician
<b>Seek Immediate Attention: Ingestion</b>	No
<b>Injection</b>	
<b>Seek Immediate Attention: Injection</b>	No
<b>Storage</b>	
<b>Storage Measures</b>	Reacts with acids releasing toxic chlorine gas Keep away from acids Store in accordance with local and national regulations Keep only in original container Store in a closed container Keep from freezing
<b>Emergency Measures</b>	
<b>Emergency Measures</b>	
<b>Fire Fighting</b>	
<b>Fire Fighting Measures</b>	Carbon dioxide Dry powder. Water spray jet Fight larger fires with water spray jet or alcohol-resistant foam
<b>Unsuitable Fire Fighting Measures</b>	
<b>Transport</b>	

			
<b>Transport Hazard Class(es)</b>	8		
<b>Transport Special Precautions</b>			
<b>Summary</b>			
<b>Summary</b>			
<b>Have you considered using an alternative substance?</b>	Yes		
<b>Reasoning</b>	Alternative/suitable, less hazardous product not available.		
<b>Overall Potential Risk Level</b>	2		
<b>Overall Residual Risk Level</b>	2		

## Appendix 2 Adverse Health Effects

If not properly controlled, hazardous substances may cause ill health. They can enter the body through four main routes:

- Inhalation
- Ingestion
- Absorption (through the skin / eyes / mucous membranes)
- Injection e.g. by sharps injuries

The health effects that they cause may be acute (for example, immediate throat and eye irritation) or chronic (such as occupational asthma).

In order to help protect the health of workers and prevent ill health, some particularly hazardous substances have been allocated a Workplace Exposure Limit, WEL.

## Appendix 3 Example Emergency Procedure

**Major Spillage** (e.g. spillage that cannot be contained/cleaned up inhouse and may result in a significant risk to human health or to the environment)

Person in charge (e.g. most senior member of staff available) designates the spillage as a major spill and ensures the fire alarm is sounded and summons the Emergency Fire & Rescue Service, then evacuate the room / area and surrounding area.

Person in charge shall act as the liaison for the Emergency Fire & Rescue Service, providing them with the Safety Data Sheets, COSHH assessment, information on the location, type and amount of substances present, etc.

Person in charge to contact and inform a senior member of staff to escalate the incident information.

Ensure employees, contractor, visitors, member of the public and others remain away from the affected area until the senior Fire & Rescue Officer present deems it safe to return.

Person in charge must complete a Assure Incident Form as soon as possible and arrange for the incident to be investigated.

If any member of staff experiences symptoms or irritation of the respiratory tract, eyes or skin, they should attend the nearest Emergency Department and be referred to Occupational Health.

**Minor Spillage** (e.g. spillage can be contained/cleaned up by trained competent TC staff members)

If required, the person in charge (e.g. most senior member of staff available) ensures that all non-essential employees vacate the room / area until the spillage has been dealt with.

A trained member of staff puts on, dons, suitable protective clothing provided, which may include organic vapour / particulate respirator (See Respiratory Protective Equipment section), nitrile gloves, non-permeable apron and goggles.

A trained member of staff contains the spillage using appropriate spill kits.

A trained member of staff removes residue in accordance with the manufacturer's recommendations.

A trained member of staff disposes of contaminated residue in the waste bags provided in the spillage kits or a suitable container. The waste and used PPE / RPE should be disposed of as hazardous waste.

Person in charge must complete a Assure Incident Form as soon as possible and arrange for the incident to be investigated.

If any member of staff experiences symptoms or irritation of the respiratory tract, eyes or skin, they should attend the Emergency Department and be referred to Occupational Health.

## Appendix 4 Record of Suspected Odour Problem

In order to assist your Department Manager in investigating your concerns, you are requested to keep a record of the odour problem and how it affected you using the table below (use a separate sheet if necessary). Ensure that you record the time the odour / systems are first noticed, and the time you believe you can no longer sense the odour / symptoms.

Your Details and Alleged Source of the problem:

Name..... Location of odour or onset of symptoms.....

Alleged source of the odour (if applicable).....

Managers name.....

Date	Time Start/ Finish	Intensity score	Offensiveness score	Intensity x Offensiveness / Symptoms	How it affects you / Symptoms

Score	Intensity	Score	Offensiveness / Symptoms
1	Faint odour	1	Pleasant
2	Distinct odour	2	Mildly unpleasant
3	Strong odour	3	Moderately Unpleasant
4	Very strong odour	4	Unpleasant
5	Extremely strong odour	5	Very unpleasant

Signed.....

Date.....

The completed form should be returned to your manager.

The manager shall arrange for this information to be added to a Assure-Report an Occupational Health Record and contact the Corporate H&S team for further guidance.

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This document can be made available in other languages and formats.  
For more information please contact 01803 208025

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