



## COSHH Policy

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## Contents

1. Policy statement.....	2
2. Legal duties and sources .....	2
3. Responsibilities .....	3
4. Hazard identification and inventory.....	3
5. COSHH risk assessment process.....	4
6. Control measures and safe systems of work .....	4
7. Information, instruction and training.....	4
8. Health surveillance.....	4
9. Monitoring, review and audit.....	4
10. Incident reporting, spill response and first aid .....	4
11. Storage, transport and disposal.....	5
12. Contractors and off-site activities.....	5
13. Record keeping.....	5
14. Review of the policy .....	5
15. Implementation checklist .....	5
16. Key references and guidance.....	5

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### **1. Policy statement**

The Cherry Tree Trust is committed to protecting staff, pupils, visitors and contractors from health risks arising from exposure to hazardous substances used, stored or produced in Trust premises or during Trust activities. We will ensure that the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and other relevant health and safety law are complied with and that risk is reduced so far as reasonably practicable.

### **2. Legal duties and sources**

This policy is written to reflect The Cherry Tree Trust's duties under:

- Health and Safety at Work etc. Act 1974 (employer duties).
- Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended).
- Management of Health and Safety at Work Regulations 1999 (risk assessments and arrangements).
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) (reporting obligations).
- HSE guidance and Approved Code of Practice (L5) on COSHH and HSE education/schools guidance.

### **Load-bearing legal facts:**

1. The employer (The Cherry Tree Trust) has primary duty to protect employees and others under the Health and Safety at Work etc. Act 1974.
2. COSHH requires employers to assess and control the risks from hazardous substances to prevent ill health.
3. Management Regs 1999 require suitable and sufficient risk assessments and arrangements for implementing control measures.
4. Certain work-related injuries, diseases and dangerous occurrences must be reported under RIDDOR 2013.
5. HSE provides sector-specific guidance for education settings (classroom checklists, science labs, cleaning, safe storage/disposal). Schools must follow that practical guidance.

### **3. Responsibilities**

#### **Trust Board**

- Accept overall legal responsibility for health and safety and ensure adequate resources for Coshh compliance (policy, training, competent advice, monitoring).

#### **Head Teacher (on behalf of the Trust)**

- Ensure this policy is implemented across The Cherry Tree Trust, appoint a competent Health & Safety lead, receive regular reports on Coshh compliance and incidents.

#### **Central H&S Lead**

- Develop Coshh arrangements, provide templates (inventory, risk assessment, PELs), coordinate training, maintain central records, audit schools, and act as competent advisor on hazardous substances.

#### **School Leadership Team**

- Ensure day-to-day Coshh compliance at the school, maintain local hazardous substances inventory, ensure risk assessments are carried out for all tasks involving hazardous substances, ensure staff are trained and supervised, and report incidents to The Cherry Tree Trust and, where required, to HSE under RIDDOR.

#### **Site Manager / Premises Staff / Science Technician**

- Control storage, ordering, safe disposal, labelling and secure areas; ensure Coshh data (SDS) is available and used; ensure ventilations and controls are checked.

#### **Staff / Contractors**

- Follow risk assessments and safe systems of work, use PPE correctly, attend training, report defects, near misses and incidents.

#### **Employees (including supply staff and volunteers)**

- Take reasonable care for their own health and safety and that of others, follow instruction and report hazards.

### **4. Hazard identification and inventory**

- Each school must maintain an up-to-date electronic and physical inventory of hazardous substances (cleaning products, laboratory chemicals, D&T substances, art chemicals, adhesives, pesticides, solvents, refrigerants, aerosols, fuels). The inventory must include product name, location, quantity, risk phrases, and the supplier Safety Data Sheet (SDS).
- The H&S team will supply a standard inventory template and require copies during audits.

### **5. Coshh risk assessment process**

All use, storage and disposal of hazardous substances must be subject to a written Coshh risk assessment that is “suitable and sufficient”. Each assessment must record: activity, substance (with SDS), who may be harmed, risk level, existing controls, additional control measures required, PPE, monitoring, health surveillance (if needed), emergency measures and review date. Follow HSE guidance for completing Coshh risk assessments.

Control hierarchy to be applied in the risk assessment (in order): eliminate (substitute where possible), isolate, engineering controls (ventilation), safe systems of work, administrative controls (training, supervision), and PPE as last resort.

## **6. Control measures and safe systems of work**

- Wherever possible use least-hazardous products (substitution). For practical activities (science, DT, art) use pre-prepared low-risk alternatives.
- Provide and maintain engineering controls (local exhaust ventilation for some labs/DT processes) where required.
- Use clearly written Standard Operating Procedures (SOPs) for hazardous tasks (preparation, use, storage, cleaning, spill control). SOPs must reference SDS and be included with the COSH� assessment.
- Provide appropriate PPE (gloves, goggles, aprons) only where risk assessment indicates; ensure correct selection, storage and disposal.
- Store substances securely with correct segregation, in suitable containers, labelled and with SDS accessible. Flammable liquids must be stored in approved cabinets; hazardous waste must be segregated for disposal according to environmental legislation.

## **7. Information, instruction and training**

- The Cherry Tree Trust will provide training for Heads, site staff, technicians and any staff who handle hazardous substances. Training records are held centrally. Local inductions cover COSH� basics and location of SDS. Training must include how to read SDS, control measures, emergency procedures and how to report concerns.

## **8. Health surveillance**

- Where COSH� assessments identify a risk of occupational disease (e.g., exposure to certain dusts, isocyanates, lead, or biological agents), the Cherry Tree Trust will arrange health surveillance through occupational health services and will keep records in accordance with guidance and data protection requirements.

## **9. Monitoring, review and audit**

- Control measures must be monitored (checklists, supervision, inspections). All COSH� assessments should be reviewed at least annually or whenever there is a significant change (new product, new process, incident). H&S will audit schools on a rolling programme (minimum biennial) and more frequently where risk is higher.

## **10. Incident reporting, spill response and first aid**

- All incidents or near misses involving hazardous substances must be reported to the Headteacher and The Cherry Tree Trust H&S Lead immediately and recorded. If the incident meets RIDDOR criteria, it will be reported to HSE. Guidance on what requires RIDDOR reporting is followed.
- Each school must maintain spill kits appropriate to the substances present and SOPs for spill response. First aid arrangements must reflect substance hazards (e.g., eyewash facilities where corrosives are used).

## **11. Storage, transport and disposal**

- Follow supplier SDS and HSE guidance on safe storage and segregation. Flammables, acids, alkalis, and solvents must be stored correctly in labelled containers and cabinets. Keep COSH� inventory updated with quantities so environmental permits and hazardous waste obligations are tracked. Ensure hazardous waste is disposed via authorised contractors; central procurement should use approved waste contractors.

## **12. Contractors and off-site activities**

- Contractors bringing hazardous substances onto site must provide SDS and method statements before work begins and must comply with site COSH rules. Off-site visits must include review of potential hazardous substances (e.g., use of art/DT materials at external venues), and the trip risk assessment must consider COSH risks.

## **13. Record keeping**

Schools must keep: COSH inventories, SDSs, risk assessments, training records, inspection and maintenance records, health surveillance records, incident/near-miss reports and RIDDOR reports. The Cherry Tree Trust H&S team will maintain central copies of key records.

## **14. Review of the policy**

This policy will be reviewed annually or sooner where required by changes in legislation, HSE guidance, The Cherry Tree Trust's structure or after a serious COSH incident.

## **15. Implementation checklist**

1. Confirm H&S lead and local COSH lead.
2. Complete or update the school COSH inventory and attach SDSs.
3. Conduct COSH assessments for each hazardous task and store them centrally.
4. Ensure local staff training and induction include COSH.
5. Check storage, labels and spill kits; ensure eyewash/first aid where needed.
6. Ensure contractors supply SDS and method statements.
7. Put monitoring and review dates in the calendar; schedule central audit.
8. Confirm incident reporting route and RIDDOR responsibilities.

## **16. Key references and guidance**

- HSE — Control of Substances Hazardous to Health (COSH)
- HSE — *The Control of Substances Hazardous to Health Regulations 2002*
- HSE — *Control of substances hazardous to health (Sixth edition)*
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- RIDDOR 2013
- HSE — Safe storage and disposal for school chemicals
- HSE — Classroom health & safety checklist