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General Health and Safety Policies: COSHH, Manual Handling, PPE, Review of Systems, Training and Working at Height

HAZARDOUS SUBSTANCES

1. **Duties and compliance.** The COSHH Regulations impose duties on the School to protect its staff and any other persons who may be affected by hazards in the School and involving substances hazardous to health. The Regulations, and compliance with them, as with any other health and safety legislation, must constitute an integral part of the management system; compliance with the Regulations not only ensures compliance with the law, but will prevent incidence of ill health, ensure best working practice and will encourage the evolvment of a health and safety culture within the organisation.

2. **Managing risk.** In order to ensure compliance, all working with hazardous material must ensure that work is not undertaken that is liable to expose anyone to any substance hazardous to health unless suitable and sufficient assessment of the risks has been undertaken and suitable; and that sufficient control measures identified and implemented so as to reduce the risk to the lowest level reasonably practicable.

3. **Eight principles of good practice.** The Regulations introduce eight principles of good practice that will apply regardless of whether a substance has been assigned a Workplace Exposure Limit (WEL). According to HSE, employers who do not follow these eight principles will, by implication, not be properly protecting their employees. The principles are:

- a. Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health.
- b. Take into account all relevant routes of exposure - inhalation, skin absorption and ingestion - when developing control measures.
- c. Control exposure by measures that are proportionate to the health risk.
- d. Choose the most effective and reliable control options, which minimise the escape and spread of substances hazardous to health.
- e. Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment.
- f. Check and review regularly all elements of control measures for their continuing effectiveness.
- g. 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.
- h. Ensure that the introduction of control measures does not increase the overall risk to health and safety.

4. **Requirement for risk assessment and review.** A risk assessment must be undertaken prior to any work commencing to enable the employer to assess the risks involved and to adequately control the exposure of their employees to substances hazardous to health. The Regulations also require that an assessment shall be reviewed regularly and forthwith if:

- a. There is reason to suspect that the assessment is no longer valid; or

- b. There has been a significant change in the work to which the assessment relates, and
- c. Where as a result of the review, changes in the assessment are required that those changes be made.

5. **Purpose of risk assessment.** The purpose of an assessment is to enable a valid decision to be made about measures necessary to control substances hazardous to health arising from any work. It also enables the employer to demonstrate readily, both to himself and other persons, that all the factors pertinent to the work have been considered, and that an informed and valid judgment has been reached about the risks, and the steps that need to be taken to achieve and maintain adequate control. The COSHH Regulations provide a framework to protect people at work against health risks that may arise from work activities that expose them to hazardous substances. The essential steps that must be taken are:

- a. Assess the risks to health arising from the use of the hazardous substances in the work activity.
- b. Decide what precautions and control measures are necessary to minimise the risk.
- c. Implement the control measures.
- d. Ensure control measures are used and maintained.
- e. Monitoring exposure of workers (if necessary).
- f. Consider whether health surveillance is appropriate, or required.
- g. Ensure the operatives have sufficient information, instruction and training so as to perform the work safely and competently.
- h. Ensure there is in place adequate procedures to deal with emergency situations.

6. **Responsibilities.** Teachers/departments/contractors that use hazardous substances are responsible for their use and management. They are to:

- a. Hold a COSHH register – a list of hazardous items they use with the control/data sheet.
- b. Ensure that substances are safely stored and labelled.
- c. Have an up to date risk assessment.
- d. Supervise and ensure safe use of the substance, including the use of PPE.
- e. Where necessary conduct training on the substance and hold records. If requested, they are to provide a copy to the Bursary.

7. **Management.** The following appointments have COSHH management responsibilities:

Appointment	Responsibility	Frequency	Remarks
Assistant Bursar	Governance and supervision	Annually or changes to guidance/legislation	

Heads of department	Register Risk assessments Training	As required	
Group Operations Bursar	Register Risk assessments Training	As required	
Contractors	Register Risk assessments Training	As required	Assistant Bursar (Prep) Group Estates Bursar

8. **Training.** Where necessary a competent and current person is to carry out instruction and training to ensure the following are understood:

- a. Use of the substances, their handling, storage and disposal
- b. Emergency Procedures
- c. Methods of Control
- d. Use of Personal Protective Equipment
- e. Record all information on relevant assessment form.

Where a member of staff has a knowledge deficiency, they are to request training through the Bursar.

MANUAL HANDLING

1. **Introduction.** Manual handling can be defined as activities in which human effort is applied to a load. That is the lifting, supporting, setting down, pushing, pulling or carrying of a load by hand or bodily force.

2. **Employer's responsibilities.** The School is responsible for:

- a. Avoiding the need for hazardous manual handling as far as is reasonably practicable.
- b. Assessing the risk of injury from any manual handling operation that cannot be avoided.
- c. Reduce the risk of injury from hazardous manual handling as far as is reasonably practical.
- d. Review the assessment as and when changes occur.
- e. Provide training to managers and employees in how to carry out manual handling risk assessments.

3. **HoD responsibilities.** Manual Handling Operations Regulations 1992 is to make handling in the workplace safer. HoD are therefore required to:

- a. Identify manual handling activities undertaken in their service.

- b. Where it is not possible to avoid manual handling activities then managers are responsible for ensuring that a manual handling risk assessment is completed.
 - c. To ensure that the risk assessment addresses all the factors related to that activity including:
 - (1) Load.
 - (2) Task.
 - (3) Environment.
 - (4) Individual Capability of the Handler.
 - d. Ensure that any risk assessment is carried out by a competent person
 - e. Ensure that the finding of the manual handling risk assessment are recorded.
 - f. Ensure the findings of the manual handling risk assessment is communicated to those staff undertaking the manual handling activities.
 - g. Ensure the risk assessments documentation is available for all staff to view.
 - h. Ensure staff comply with the safe system of work as identified by the manual handling risk assessment.
 - i. Monitor the manual handling safe system of work within their areas of responsibility
 - j. To ensure that staff attend for appropriate training to develop, maintain and update their manual handling skills.
 - k. To investigate all accidents and incidents relating to manual handling activities. To ensure these accidents are reported in accordance with the PCT's incident reporting procedures (see Incident Reporting Policy)
 - l. To review risk assessments post accidents/ incidents and put in place action to prevent a recurrence.
4. **Staff responsibilities.** Staff are responsible for their own safety and for the safety of others when carrying out manual handling activities. They are therefore required to:
- a. Follow the manual handling safe system of work as identified by the risk assessment process.
 - b. Use equipment provided for their safety as identified by the manual handling risk assessment.
 - c. Follow the procedure for the reporting of incidents or injuries arising from manual handling activities involving employees, service-users and others on school property, as well as any such incidents in the community where staff carry out their duties.

- d. Attend appropriate manual handling training, which is mandatory for all staff. It is the responsibility of individuals to attend training sessions organized for their benefit.
- e. Ensure their clothing and footwear is suitable for the task and does not contribute to the risk of injury from manual handling activities.
- f. Co-operate with their HoD and the School on health and safety matters and inform them of any condition affecting them personally which might influence their ability to safely undertake any manual handling tasks.
- g. Report defects in machinery or equipment to their manager and remove from use until the problem is remedied.
- h. To bring to their employer's attention any deficiencies in the arrangements the employer has for the management of health and safety and any deficiencies manual handling issues.

5. **Training.** The Bursar will coordinate H&S training for the School.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. **Providing PPE.** PPE should be regarded as the last resort to protect against risks to health and safety. HoD must, therefore, ensure that through a process of risk assessment consideration is first given to the use of controls and safe systems of work. In the event that after consideration of the above, there is still a residual risk, PPE will need to be provided. The following principles for controlling risk should, therefore, be applied, preferably in the following order:

- a. Choose a less risky option/practice.
- b. Prevent access to the hazard.
- c. Organise work to reduce exposure to the hazard.

If after all the above there is still a residual risk, provide appropriate PPE. Where any doubt may exist as to the action that is required to be taken or assistance being necessary, contact should be made with the Bursar for advice.

2. **Selecting Personal Protective Equipment.** Once it is established that PPE is a requirement, HoDs must ensure that they choose equipment which is correct for the particular risks involved and for the circumstances of its use. This will be achieved through a formal assessment of the suitability of the PPE and will be recorded. In selecting PPE they will need to consider the following factors:

- a. Is the PPE appropriate for the risks involved and the conditions at the place where exposure to the risk may occur?
- b. Does the PPE prevent or adequately control the risks involved without increasing the overall level of risk?
- c. Can it be adjusted to fit the wearer correctly?
- d. Has the state of health of those who will be wearing it been taken into account?

- e. What are the needs of the work and the demands it places on the wearer?
- f. If more than one item of PPE is being worn, are they compatible with each other?

3. **Charging for PPE.** The Regulations specifically state that no charge can be made to a worker for the provision of PPE which is used only at work. This relates to all charges including refundable deposits. The School will provide PPE for school requirements.

4. **Marking of PPE.** HoDs must ensure that any PPE provided within their Department bears the 'CE' mark and complies with the Personal Protective Equipment Regulations 2002, concerning the design or manufacture of PPE with regard to health and safety.

5. **Maintenance of PPE.** HoDs must ensure that all PPE is maintained (including replaced or cleaned as appropriate) in an efficient state, in efficient working order and in good repair. In practice, this will require an effective maintenance system for each type of PPE, which includes the following:

- a. Examination - checking for faults, damage, wear and tear, dirt.
- b. Testing - to ensure PPE is operating as intended.
- c. Cleaning - including disinfection where appropriate.
- d. Repair.
- e. Replacement.

HoDs must also ensure that responsibility for carrying out maintenance, together with the procedures are in keeping with the manufacturers or statutory guidance. Where appropriate, records of tests and examinations must also be kept.

6. **Storing PPE.** HoDs must ensure that appropriate accommodation is provided for PPE when not in use. In practice, the accommodation will be dependent on the type of PPE provided. Storage is needed as it prevents:

- a. Damage from chemicals, sunlight, high humidity, heat and accidental knocks;
- b. Contamination from dirt and harmful substances;
- c. Loss.

7. **Information, instruction and training.** HoDs must ensure that everyone who is required to wear PPE is competent to do so, having received suitable and sufficient information, instruction and training (including refresher training) to enable them to make effective use of the PPE provided. The extent of the instruction and training will vary with the complexity and performance of the equipment, how frequently it is used, and the needs of the people being trained.

8. **Reporting loss or defect.** Staff, students and others who are required to wear PPE must take reasonable care of it. Users of PPE, who have any concerns about the serviceability of the PPE, should immediately report this to their HoD.

REVIEW OF SYSTEMS

1. **Introduction.** Heads of Departments, both Teaching and Support, are required to review systems regularly to ensure they are appropriate. The aim of these reviews is to minimise the risk of accident or injury to both pupils and staff when working in their particular department.
2. **Scope.** The reviews will take into account the following principles as far as reasonably practicable:
 - a. Assess changes to the layout and use of the working areas. Safe access to and egress from the areas must be maintained.
 - b. Assess changes to the tasks involved. Review risk assessments and the provision of clear instruction.
 - c. Where appropriate, review details of the correct sequence of operations involved.
 - d. Check that all safe procedures, both routine and emergency, are identified.
 - e. Assess whether written procedures are necessary for the operation of potentially hazardous machinery or for the use of potentially hazardous materials.

TRAINING

1. **Teaching Staff.** Teaching Staff engaged have all received teaching training. Additional training and guidance as to specific requirements will be given either by reference to this Health and Safety Policy or by other means as deemed appropriate. Ongoing training for teaching staff is carried out as appropriate.
2. **Support Staff.** Non-teaching Staff will be given training as necessary, appropriate to the roles that they fulfil. In all cases the training will be adequate such that, following training, staff will be competent to carry out the tasks for which they have been engaged.
3. **Matron and boarding staff.** Matron and boarding staff will receive the appropriate training commensurate to fulfil their duties.
4. **Budget.** Sufficient funding will be made available within the Courses & Training budget to ensure that all Health and Safety training needs are addressed.

ENVIRONMENTAL CONTROL

1. **General.** The School will comply with all HSE legislation and DofE guidance. All statutory checks are contained within the School's compliance register.
2. **Classrooms, Boarding Accommodation and General Areas.** Conditions in these areas are monitored regularly to ensure that temperature, ventilation and lighting are adequate for the purpose to which the areas are put. The School endeavours to ensure that all areas are in line with the most up to date requirements in the educational sector.
3. **D&T Workshop, Art Room and Science Laboratories.** Conditions in these areas are monitored closely to ensure that they do not become contaminated when using substances that may be controlled under the Control of Substances Hazardous to Health Regulations 2002. All

these areas have good ventilation and use mechanical ventilation as necessary to ensure that air quality remains good.

4. **Noise.** The School regards Noise as an important issue and takes the following action in order to minimise its effect:

- a. Installations and equipment are looked at carefully to establish whether reductions in noise levels can be made by isolation, damping, absorption and insulation.
- b. Where it is not possible or practical to control by the methods outlined above, hearing protectors will be used.
- c. Where applicable, noise assessments will be carried out by the Health and Safety Officer with assistance from other personnel. As appropriate specialists and noise meters will be used to monitor the noise situation to comply with the requirements of the Control of Noise at Work Regulations 2005.

WORKING AT HEIGHT

1. **General.** Working at height remains one of the biggest causes of fatalities and major injuries. Common cases include falls from ladders and through fragile surfaces. 'Working at height' means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury (for example a fall through a fragile roof). School employees should avoid working at height where it is reasonably practicable safe to do so.

2. **Guidelines.** The School guidelines are:

- a. Do all that is reasonably practicable to prevent persons from falling.
- b. Where working at height cannot be avoided, a suitable and sufficient risk assessment must be undertaken by a competent person to identify the significant risks associated with working at height.
- c. Adequate control measures must be implemented to reduce the risk associated with the identified hazards. The control measures must be communicated to relevant persons, implemented and monitored by management.
- d. Adequate training for employees who are expected to work at height, as identified by the risk assessment, to ensure their safety.

3. **Risk Assessments.** An adequate risk assessment will identify the significant hazards associated with working at height, who will be at risk, the likelihood and severity of harm from those hazards, the magnitude of risk, the control measures to reduce that risk and who has responsibility in ensuring the management of the risks. They must be undertaken for work at height carried out by school employees, including research and fieldwork activities. The risk assessment will cover the following areas:

- a. The work is properly planned and organised.
- b. The work is appropriately supervised.
- c. The work is carried out in a manner which is so far as reasonably practicable safe.

- d. Collective control measures have priority over personal protection measures.
- e. The work equipment is suitable and sufficient for the task and environment.
- f. Due consideration is given to the location and environmental hazards.
- g. There are plans in place for emergencies, fire and rescue.
- h. Risk assessments and associated documentation should be recorded and reviewed regularly.

4. **Competence.** A competent person to complete a risk assessment is one who has attended risk assessment training and suitable working at height training and has the relevant technical knowledge, expertise and experience in the task/environment for working at height. Risk assessments are communicated to the employees undertaking the work at height and anyone else who may be affected is informed. Management ensure the control measures are implemented and monitor the effectiveness of the control measures. Everyone involved in the work is competent (or, if being trained, is supervised by a competent person). This includes involvement in organisation, planning, supervision and the supply and maintenance of equipment.

5. **Emergencies and Accident/Near-Hit reporting.** All persons working at height are aware of and follow the emergency procedures. This includes following specific rescue plans. Employees can report unsafe working, near-hit incidents and accidents using the Incident Report Form.

6. **Working at Height Hazards.** Below are common hazards associated with working at height:

- a. Fall from height. Falling from height can cause serious personal injury. It can be a relatively small distance that results in serious injury and there is no activation height at which this Policy becomes valid. Additional Information:
 - b. Control measures to reduce the risk of falling are listed from the most effective to the least. However, the control measures taken must be a combination of collective preventative and personal protective measures.
 - (1) Avoid working at height if you can.
 - (2) Work will be carried out from an existing place of work.
 - (3) Access or egress from a place of work will be by existing means.
 - (4) Provide sufficient work equipment that prevents falls occurring.
 - (5) Provide sufficient work equipment to minimise the distance fallen and the consequence.
 - (6) Provide sufficient work equipment to minimise the consequences of a fall.
 - (7) In addition, training, instruction, information and, in some cases, supervision to prevent falls from height liable to cause personal injury.

(8) Work equipment. The equipment selected to work at height must be suitable. Consider the following aspects of use when selecting working at height equipment:

- The environmental conditions in which it will be used.
- The nature of the work to be performed and the foreseeable loadings.
- Who will be using the equipment and training requirements.
- Adequate strength, height and rigidity.
- Equipment meets the standard relevant to its intended use.
- Adequate for the expected duration and frequency of use.
- Additional risks associated with use, storage, installation and transportation.

c. Ladders. Ladders can only be used if the risk assessment demonstrates they are the most suitable work equipment for low risk tasks. Ladders should be used for short duration work. If a ladder has to rest on any surface it must be stable, firm or of sufficient strength to safely support the ladder and load. The rungs must remain horizontal and able to support the load. Ladders must be positioned to ensure stability during use. It must be compliant with the relevant European and British standard.

d. Fragile surfaces. Passing across or near or working on, from or near fragile surfaces, is prohibited. However, where this is not possible, suitable and sufficient platforms, coverings, guard rails or similar means of support or protection are provided and used. Where the risk of falling through fragile surfaces still remains suitable and sufficient measures to minimise the distance and consequence of the fall are put in place. Prominent warning notices are put in place where fragile surfaces are situated.

e. Falling objects. Suitable and sufficient steps to prevent, so far as reasonably practicable, the fall of any material or object and steps to prevent any person being struck by any falling material or object which is likely to cause injury.

f. Weather conditions. Work at height shall only occur when the weather conditions do not jeopardise the health and safety of employees and others affected by that work.

g. Working environment. Where there is an area, owing to the nature of the work at height, there is a risk of someone falling, devices preventing unauthorised persons from entering such an area must be erected. Such areas are clearly indicated. Also, the safe use of work equipment should include its placement within the working environment and other hazards present.

h. Roof work and access. Before access is granted to any roof, a risk assessment must be completed to mitigate any risk to LOW. The Bursar must sign the assessment and agree to the work.

7. **Working at Height Guidance.** Before an employee begins work, they should have the following in place to ensure their safety; a suitable and sufficient risk assessment for the work at height they are about to undertake, be adequately trained and have appropriate work equipment to work at height.

8. **Ladders and stepladders.** Ladders and step ladders are a major cause of severe workplace injury. It is reported that a third of all reported falls from height in the UK involve ladders and stepladders. The following guidance must be complied with:

- a. A suitable ladder/stepladder for the task.
- b. In one position for a maximum of 30 minutes.
- c. For 'light work' involving loads less than 10 Kg (1½ stone) in addition to the employee. Ladders are not suitable for strenuous or heavy work. If the loads carried are big, heavy or frequently carried a detailed manual handling assessment must be done.
- d. Only trained and instructed employees use ladders and step ladders.
- e. Access ladders must protrude 1 m above the working surface and be tied.
- f. The rungs are level and on even ground. Specialist levelling devices can be used. However, bricks or bits of wood are not acceptable levelling devices.
- g. Employees must maintain three points of contact (i.e. two feet and one hand on the ladder) at the working position.
- h. Wear robust, sensible footwear in good condition and not covered in mud or other slippery contaminants.
- i. Employees are fit to use ladders and stepladders using a ladder.

9. **Kick stools.** Kick stools are used when stepladders and ladders are impracticable and are subject to regular and thorough inspection. Inspection records should be kept and unsafe kick stools removed immediately from the workplace. Regular users are required to undergo suitable training and report unsafe equipment. The user should:

- a. Conduct a pre-use check of the kick stool.
- b. Check the wheels are all present and not clogged by material.
- c. The wheel locking mechanism must work for all wheels.
- d. The kick stool surface is free from dirt, liquids and not loose.
- e. Kick stools are designed to be moved with minimum effort with the feet. Before moving the stool check to make sure there are no obstacles, including people, in its path. If safe to move it, propel it with a sharp, but not hard, kick aimed at the base of the kick stool. Kicking the top may cause the stool to topple.
- f. Do not attempt to stand on the stool until it has stopped moving and is in the correct position.
- g. Do not lift heavy items which may cause you to overbalance and topple.

10. **Contractors.** Contractors who conduct work at height should have their own health and safety policies to ensure the risks to their staff and school occupants are adequately managed. Those responsible for the contractors shall ensure the work at height carried out by the contractor is adequately managed and risks controlled.