



Our COSHH Data Policy and Procedure

Little Gillies is committed to providing a safe place of work and a healthy environment for all staff. This policy is in place to ensure the correct procedures are conducted in relation to COSHH.

COSHH refers to the Control of Substances Hazardous to Health, as set out by the Control of Substances Hazardous to Health Regulations Act 2002 (COSHH) (as amended, 2004) that apply to substances found in the workplace which are hazardous to health.

To comply with their duties under COSHH, we must:

- ensure, as far as reasonably practicable, the safe use, handling, storing and transporting of substances
- prevent employees being exposed to substances hazardous to health or, if prevention is not reasonably practicable, they must adequately control exposure
- identify the hazardous substances present in the workplace
- assess the risks the hazardous substances pose to people's health
- measure the concentration of hazardous substances in the air breathed in by workers in any instance where:
 - exposure limits might be exceeded
 - failure or deterioration of control measures could lead to serious risks to health
 - control measures may not operate correctly
- prepare plans and procedures in the case of an accident or emergency caused by a work activity
- provide employees with suitable and sufficient information, instruction, training and supervision.

*It is the responsibility of the Nursery Manager/Deputy Manager to ensure that the setting follows the COSHH policy and procedure.

Employees Duties

Employees must:

- co-operate with their employers to enable their employers to comply with the (COSHH 2002) (as amended, 2004)
- make proper use of control measures, including personal protective equipment
- return equipment after use to any storage place and report any defects found in the equipment



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- attend medical examinations at the appointed time and give any information about their health as may be reasonable
- report any concerns regarding health and safety associated with exposure to substances at work to their employer.

What are Substances Hazardous to Health?

COSHH covers the use of substances or preparations that are hazardous to health. Substances are defined as individual chemical compounds. Preparations are mixtures of two or more substances.

Substances Not Covered by COSHH

COSHH does not apply to substances which are covered by separate legislation, e.g. lead or asbestos.

Nor does COSHH cover substances and preparations which are hazardous solely because of their physical properties

- hot, e.g. molten metals
- cold, e.g. liquid nitrogen and other liquid gases
- pressurised, e.g. gas cylinders
- flammable, e.g. solvents
- explosive
- radioactive

Risk Assessment

The basis of the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended 2004) is a suitable and sufficient risk assessment. This means simpler and lower-risk situations will not require as much consideration as more serious and complex risks. The assessment requires:

- information to be gathered about the hazardous substances at the workplace and ways they are used; or, in the case of biological agents, ways they can be contracted
- evaluation of the likelihood of exposure and risks to health
- determination of the measures required to prevent employees being exposed to the substances or to adequately control the exposure.

Who Carries Out the Assessment?

The manager and chair person must complete the risk assessment; however, ensure the person who carries out the assessment:

- has access to and understands COSHH and any relevant approved codes of practice, or is able to consult someone who does
- has access to sufficient information about the substance and how it is used
- has sufficient knowledge and experience to make correct decisions about the risks and the actions needed
- has the necessary facilities, time and authority to do the work
- is able to talk to the appropriate people, look at existing records and examine the workplace



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- has clearly defined reporting arrangements so the findings can be acted on and any necessary action authorised.

What Hazardous Substances are Present?

The first step in the risk assessment is to identify what hazardous substances are present, or are likely to be present, in the workplace, or to be encountered during working operations.

An inventory of hazardous substances can then be drawn up. This requires identifying:

- all the activities whereby staff might come into contact with potentially hazardous substances
- the hazardous substances involved
- where substances are used
- where substances are produced
- how substances are handled and transported
- where substances are stored.

Areas that should be considered include:

- substances coming into the organisation
- substances in stock
- substances produced during the work activity, :
 - dusts
 - fumes
 - effluents
 - residues
 - wastes
- substances used for work activities, :
 - by cleaners
 - by maintenance personnel
- substances that may be encountered during work activities,
- micro-organisms that may be present,

Using and creating Safety Data Sheets

Safety data sheets (SDS) should be:

- collected together and kept in a central file
- made available to staff using a potentially hazardous substance
- referred to when completing a risk assessment.
- Highlight the section that outlines what medical aid needs to be applied in the event of an emergency (this will help save time as the whole document will not need to be read to find the directions).
- Highlight areas on the sheet that give directions in the event of medical attention

It should be noted that SDS sheets do not constitute a risk assessment in themselves. Gathering SDSs is only the first stage in the assessment process.

Evaluating the Risk

The first step to evaluating the risk from using a hazardous substance is to find out:



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- how the substance is used
- where the substance is used
- how much of the substance is used.

Those who are likely to be exposed should be identified, including those not directly involved in the activity,

It will be necessary to decide whether to assess an activity or to assess the uses of a specific substance. The assessment will involve considering:

- the potential of the substance to cause harm to health
- the chance of exposure
- frequency and duration of exposure
- the level of exposure.

The assessment should not only consider normal activity. Activities such as maintenance and cleaning should also be considered, as should emergency or non-routine situations. It should also be remembered that employees do not always “do things by the book”.

It may not be necessary to carry out measurements as it may be obvious what is required. However, if particularly hazardous substances are used, or the level of exposure is not known, it may be necessary to carry out measurements. Circumstances in which the determination of the level of exposure is important include:

- frequent exposure
- a high level of exposure
- if the substance has a WEL (workplace exposure limits) or a biological monitoring guidance value
- if the substance can cause cancer, asthma or respiratory sensitisation or is very hazardous.

Principles of Good Practice

Exposure should be controlled by implementing the following principles of good practice.

- Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health.
- Take into account all relevant routes of exposure, e.g. inhalation, skin absorption and ingestion when developing control measures.
- Control exposure by measures that are proportionate to the health risk.
- Choose the most effective and reliable control options to minimise the escape and spread of substances hazardous to health.
- Provide suitable PPE in combination with other control measures where adequate control of exposure cannot be achieved by other means.
- Check and review regularly all elements of control measures for their continuing effectiveness.
- Inform and train the relevant staff on the hazards and risks from the substances with which they work and the use of control measures provided to control the risks.
- Ensure that the introduction of control measures does not increase the overall risk to health and safety.



Personal Protective Equipment (PPE)

PPE should only be used if the other control measures cannot give sufficient control of exposure.

The PPE must be:

- suitable for controlling exposure adequately
- properly stored
- checked at suitable intervals
- repaired or replaced if found to be defective.

Staff should be trained on how to correctly use and look after the PPE.

Risk Assessment Review

The assessment should be reviewed at regular intervals, and immediately if there is reason to suspect the assessment may no longer be valid, e.g:

- if there is a change in the process
- if defects in the system are reported, particularly if there has been an accident or incident
- if an employee reports concerns about their health as a result of exposure to a substance
- if a worker reports concerns regarding the adequacy of safety control measures
- as a consequence of results from monitoring exposure, examination or testing of engineering controls or health surveillance
- as a consequence of illness or injury
- if there is a change in legislation.

Where as a result of the review, changes to the risk assessment are required, those changes must be made.

Hazardous Substances in Early Years Workplaces

Typical hazardous substances that might be found in an early years workplace include:

cleaning

- many cleaning substances can be irritants, especially bleach-based toilet or surface cleaning substances and those that release fumes or vapours
- touching the face, eyes or skin after handling a bleach-based cleaning substance can cause irritation, inflammation or chemical burns
- corrosive drain-cleaning materials based on concentrated sulphuric acid or strong caustic soda can be corrosive
- general detergents, surface cleaning materials and floor cleaners can be irritant and cause contact dermatitis
- in kitchens, oven cleaners can release irritant fumes

maintenance work

- glues (contact adhesives, etc.), paints, solvents and lubricants can all act as irritants and may be hazardous to use, particularly in enclosed spaces without adequate ventilation
- water treatment chemicals are used to control the risk of Legionnaires' disease
- dusts (concrete dust, wood dust, etc.) can be released during maintenance or construction

offices



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- toner cartridges for laser and Inkjet printers may contain chemicals and produce dust which can be potentially hazardous — toners should be left sealed and should be immediately “bagged” when replaced
- photocopiers should be used in well ventilated spaces.

Cleaning

The use of detergents and bleach-based products to keep the early years environment clean and hygienic must be subject to COSHH risk assessment. Equipment, toys and surfaces will need regular cleaning and may require occasional sterilising, such as during an outbreak of infectious disease, such as norovirus. Staff may also occasionally need to clear up spillages of body fluids, such as urine and faeces.

The risk assessment should note that chlorine releasing cleaning substances should never be applied directly to urine spills as this can result in the release of hazardous gases.

In all cases detergents and chlorine releasing cleaning agents should be handled, used, stored and disposed of safely. SDSs should be made available and safe schemes of work implemented. Staff should be adequately trained and provided with any required PPE. All cleaning chemicals should be stored in their original bottles and should be locked away from children.

All policies and procedures are implemented, reviewed and updated on an annual basis or in line with any changes to local and national guidance/legislation in conjunction with the registered person.

This policy was adopted at a meeting of Little Gillies

Held on.....

Date to reviewed

Signed on behalf of the provider.....

Name of signatory.....

Role of signatory.....

Reviewed by Sarah Beresford

Date June 2023