



## **Non-Curriculum Hazardous Substance Compliance Code**

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Annex A – COSHh Assessment

## 1. Introduction

West Norfolk Academies Trust schools are low risk in regards to Hazardous Substances. Where a hazardous substance is utilised as part of a curriculum requirement, such as Science or Technology, the control measures will be defined in the relevant department compliance code with information made available through association with CLEAPSS. Therefore, this compliance code is in regards to hazardous substance that may be utilised in none curriculum aspects of the school sites such as cleaning or on site maintenance.

## 2. Responsibilities

Ultimately the headteacher holds the responsibility for H&S at their respective school sites. However, this responsibility can be delegated to other managers who are responsible for ensuring compliance with this Compliance Code in their respective teams/areas they manage. This includes ensuring hazardous substances are identified, assessed, the key findings shared with those at risk, and that control measures identified in the risk assessment are implemented and monitored.

## 3. What substances need to be assessed?

As part of their work, some staff may be at risk of exposure to substances hazardous to their health. These may take the form of gases, vapours, liquids, fumes and solids (e.g. dusts); on their own or as part of a mixture.

Substances may be:

- Purchased (e.g., cleaning materials)
- Produced as part of a work activity (e.g., dust from sawing or cleaning)
- Naturally present in the environment (e.g., microorganisms in water or dust in the air).

Managers must find out what substances are being used, how exposure to substances might occur, where substances are being produced by processes or equipment used for work, and whether these substances are hazardous to health.

## 4. How can hazardous substances be recognised?

### 4.1 Pictograms

If a product displays any of the following pictograms it is considered to be a hazardous substance and suitable management and control must be put in place.



## 4.2 Material Safety Data Sheets (MSDS)

A material Safety Data Sheet (SDS) will provide information identifying if the substance is hazardous. They may contain Hazard Statements, such as H300 – Fatal if swallowed, H301 – Toxic if swallowed, H302 – Harmful if swallowed etc. The list of harmonised classifications can be found in [Annex VI](#) of the Classification, Labelling and Packaging of substances and mixtures regulations. This list is amended from time to time to keep up to date with scientific and technical developments. You should ask your supplier for a MSDS if they do not provide it automatically.

A database containing classification and labelling information on notified and registered substances is available on the [ECHA website](#).

## 5. Do different forms of the same substance present different hazards?

A substance may be hazardous in one form but not in another. For example, a piece of hardwood may not pose a risk in itself (although take care to check as some woods when handled may provoke an allergic response) but hardwood dust (e.g. created during machining / sanding) can present a significant risk if regularly exposed. Therefore, if a substance is not being used in a form that is hazardous to health and the work process does not create by-products hazardous to health; it does not need an assessment.

## 6. What hazardous substances are not covered?

Not all substances require an assessment. In the case of commercial chemicals, the presence (or absence) of a warning label will often indicate whether a substance is hazardous and requires an assessment. For example, there is no warning label on water-based marker pens or acrylic paints. Any small risk they present will likely be covered in the instructions on the packaging and so an assessment would not be necessary.

### 6.1 Other substances not covered:

Asbestos and lead, have their own specific legislative requirements

Substances which are hazardous because they are: radioactive, at high pressure, at extreme temperature, or have explosive or flammable properties, have their own specific requirements

Biological agents if they are not directly connected with work and they are outside the employers' control, such as catching a cold from a work colleague.

## 7. How do dangerous substances get into the body?

The three main ways in which products get into the body are through the mouth (ingestion), through the skin (absorption or via an open wound) or via the lungs (inhalation).

Absorption is dependent on many factors, including the size of the particles, the concentration, the length of exposure, its solubility etc. In general, the smaller particles are, the higher the risk, as it is absorbed more easily – for example, dust or an aerosol spray. The MSDS for supplied substances will indicate the risks of different routes of exposure and how the product is intended to be used.

Chemicals entering via these routes may potentially be transported in the bloodstream to other parts of the body, causing damage to other organs.

### 7.1 Digestive route (via the mouth)

Entry via the digestive route (or ingestion) is usually accidental or the result of carelessness, for example:

- Through eating, smoking, etc after having handled a dangerous product and not having washed hands.
- Through a product having been stored in a food and drink container.

- Through contamination inside/on protective equipment such as gloves being transferred when put on and/or removed.

## 7.2 Percutaneous route (via the skin)

Certain products, such as irritant and corrosive products act locally at the place where they come into contact with the skin, the mucous membrane, or the eyes. Others, which are soluble in fat, not only act on the skin but also penetrate it and spread throughout the body where they can cause various disorders. For example, solvents can degrease the skin, but also damage the liver, nervous system or kidneys. Small cuts and grazes can provide an easy route of entry for dangerous chemicals.

## 7.3 Respiratory route (via the lungs)

This is the most common entry route at work, as pollutants can be present in the atmosphere and breathed in.

This can occur when handling solvents, paints or glues, stripping paint with a blowtorch or welding for example. Once inhaled into the lungs, these chemicals enter the bloodstream and can cause damage not only to the respiratory system but also to the rest of the body.

## 8. Risk Assessing substances

Where there is risk of harm from hazardous substances a Risk Assessment must be completed and suitable control measures identified. It is good practice to maintain a contents list of all hazardous substances used on site along with their associated Risk assessments.

Generally, there are two types of COSHH Assessment to consider.

1. Process assessment - This type of assessment looks at the process or activity being conducted and includes all substances involved in the task where more than one substance is used. However, the control measures identified must be suitable to effectively lower the risk of the most hazardous substance used and may mean that the control measures are excessive when the most hazardous substance is not being used.
2. Substance specific – This type of assessment is conducted for the substance only. Where there are numerous substances this can mean numerous COSHH assessments being held. However, the control measures only become necessary when the substance is used.

In the context of a school the most likely type to use will be substance specific.

Assessments **do not** need to be completed for substances that are categorised as non-hazardous (if the chemical is not classified as a health hazard, an environmental hazard, or a physical hazard).

Where a process is identified that creates a hazardous substance as part of a process such as cutting wood or drilling into masonry then this hazard should be captured as part of a specific risk assessment (for example, Caretaker risk assessment) and a COSHH Assessment would not be required.

## 9. The stages of hazardous substance assessment

As with general risk assessment, the process for assessing hazardous substances follows 5 basic steps:

1. Identify the hazards.
2. Decide who may be harmed and how.
3. Evaluate the risks (likelihood of injury compared against severity of injury) and decide on control measures.
4. Record your findings and implement them.
5. Review your assessment and update as necessary.

### 9.1 Identify the hazards

The Coshh risk assessment form provided at Annex A allows the recording of the components of the substance, and what specific hazards they pose. This information should be obtained from the manufacturer's MSDS, labelling, HSE or trade websites. Where there is a workplace exposure limit for the substance this should be detailed on the Coshh risk assessment form.

## **9.2 Decide who may be harmed and how**

For each work activity where the substance will be stored, handled or used you need to identify how much is used, how it is used, how often, for how long and who may be exposed. All these factors will help you to consider the overall risk, when considered with the physical state of the substance and how it enters the body. As with any risk assessment, people may be identified as groups rather than individuals.

It is important to consider additional risks presented to those with existing health conditions. For example, somebody with a lung condition may be at greater risk working with substances liable to cause respiratory irritation. Similarly, individuals with certain allergies may be more at risk. Employees must inform their manager of any known allergies/allergic response to specific substances or previous sensitisation to a substance. Exposure should be avoided through substitution of the substance or restricting the use of the substance to those who may be affected.

## **9.3 Evaluate the risks and determine the necessary controls**

### **9.3.1 Evaluating the risk**

The Coshh risk assessment, Annex A, does not require that an overall risk scoring be evaluated based on likelihood and risk impact matrix scoring.

#### **Purchased Hazardous Substances**

For the purposes of the Coshh risk assessment the evaluation of risk is based upon the provision of the required controls that have been implemented. The current controls should be adequate for the classification of the substance (hazardous properties), the activity/task being undertaken (where and how harm to health is likely to occur) including all steps of the task e.g., storage, transport, handling, spillage, disposal, application.

Once these controls have been determined and implemented the risk evaluation requires that these are confirmed in the form of a current risk tolerance classification declaration (Part E of the assessment).

#### **Coshh Assessment**

In order to control the risk to the lowest reasonably practicable level, the current control measures must sufficiently control the categorised risks of harm based upon both the hazardous properties, and use of the substance, to a reasonably practicable level.

For any substance and activity where the lowest practical level of risk cannot be achieved further controls need to be identified. If the risk is unacceptable you may need to implement short term measures to reduce or eliminate the risk while longer term measures are considered e.g., you may need to stop the activity for a short time.

The Coshh risk assessment should identify the additional controls required and the Controls Actions Log section should be completed.

Once the additional control measures are implemented the current control measure column should be updated with the improved control measures.

## **9.4 Determining the necessary controls**

Having determined the level of risk, you then identify the necessary measures to control this.

**As with all other risk assessments, the principles of elimination or substitution, should always be considered first, PPE / RPE should be considered as a last resort.**

Consider:

- **Changing the work method** so that the process giving rise to exposure is no longer necessary
- **Modifying the process** to eliminate the production of hazardous by-products or waste products
- **Substituting the substance** with a non-hazardous substance that presents no risk to health.

When exposure to a hazardous substance cannot be avoided by any of the above, attempts should be made to reduce the risk by:

- Replacing the substance with a less hazardous alternative
- Using the substance in a different form e.g., pellet instead of powder
- Changing the process to a less hazardous one e.g., automatic rather than manual mixing

Once the above steps have been taken, controls should then be developed to address any risks remaining. Any Workplace Exposure Limits (WELs) must not be exceeded.

If the substance is an asthmagen (capable of causing occupational asthma), carcinogen, muten or has reproductive toxicity, an alternative product should be sourced and then re-assessed.

The risks must be reduced to as low as reasonably practicable (ALARP).

### **Examples of control measures that may be required**

- Enclosing the work process.
- Limit the area of contamination in the event of a spill or leak.
- Local exhaust ventilation.
- Reducing the number of employees exposed to the substance, or reducing the level and duration of exposure.
- Prohibiting eating, drinking and smoking in contaminated areas.
- Ensuring procedures are in place for safe storage, dealing with spillages and correct disposal. Storing flammables in a lockable labelled hazardous storage cabinet.
- Controlling the exposure of certain groups e.g., new and expectant mothers, young workers, employees with medical conditions that may be affected.
- Practising good housekeeping e.g., avoiding build-ups of dust or contaminated rags and keeping lids closed tightly on containers when a substance is not being used, etc.
- Provide welfare facilities (e.g., first aid and washing facilities for removal of contamination).

The proper use by staff of any control measures identified as necessary must be monitored to ensure their continued effectiveness.

### **9.5 Record your findings and implement them**

The COSHH assessment, Annex A, will identify the hazardous properties and use of the substance within work activities and controls that are expected to be to the lowest reasonably practicable level. When this is achieved the assessor will confirm this on the assessment declaration.

Risk assessments and other documentation, whether part of a larger activity assessment or a specific substance assessment, should be kept in line with the WNAT retention policy.

Where additional control measures are required the Controls Action Log section of the risk assessment should be completed.

Update the risk assessment as you progress. A good plan of action often includes a mixture of different things such as:

- Easy improvements that can be done quickly; perhaps as a temporary solution until more reliable controls are in place
- Long-term solutions to those risks most likely to cause injury or ill health
- Short and longer-term solutions to those risks with the worst potential consequences
- Arrangements for training employees on the main risks that remain and how they are to be controlled
- Regular checks to make sure that the control measures stay in place
- Clear responsibilities – who will lead on what action, and by when.

Headteachers may need to be notified of significant risks through the appropriate mechanisms (e.g., Risk Registers, H&S Meetings). This must be recorded on your risk assessment documentation.

## **9.6 Review**

Risk assessments should be reviewed at least annually or sooner when there is reason to suspect these are no longer valid (e.g., due to ill health or incidents occurring) or changes to technology / alternative available.

## **10. Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE)**

If it is not reasonably practicable to prevent or adequately restrict exposure through other control measures, individuals must be provided with PPE appropriate to the tasks and hazards e.g., face masks, respirators, protective gloves, eye protection, etc.

The specific type(s) of PPE that must be worn when using a hazardous substance should be detailed (including the rationale for choosing the particular item) on the risk assessment for that substance. It is not adequate to make simple statements such as 'gloves must be worn'.

Please note that it is now WNAT policy that latex gloves should not be purchased or used for any tasks, as latex itself is a hazardous substance which can affect health. Non-hazardous alternatives such as nitrile gloves should be used instead.

Employees will need to be told what protective equipment to wear, how to wear it, how to maintain it and how it will protect them. Certain face protection will need specific training and fitting to ensure effectiveness.

## **11. Health surveillance**

All cleaning and caretaker staff are required to complete an annual skin assessment declaration as it is these roles where exposure to hazardous substances is most likely to result in contact dermatitis, see below. Skin assessments questionnaires should be recorded in line with the WNAT retention policy. Where an individual reports skin issues they should make their GP aware and seek additional medical guidance. It is the line managers responsibility to identify suitable control measures that the employee must adhere to whilst considering medical guidance. Regular reviews may be required.

Contact dermatitis is a skin inflammation (eczema) from touching something irritating or allergenic, causing an itchy, red, bumpy, or blistered rash that can ooze, scale, or crack, with symptoms ranging from mild to severe depending on the trigger, like poison ivy, nickel, soaps, or chemicals, and it's managed by identifying and avoiding the cause.

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

Employees and others who use, or who might be exposed to hazardous substances, must receive appropriate information and instruction including details on the:

- Names of substances and the risks they pose to health

- Key findings of the risk assessment including the likely routes of exposure
- Any relevant workplace exposure limits
- Control measures needing to be employed to ensure adequate control
- Safe working methods e.g., for decanting, mixing, applying, clearing spillages etc
- The results of any monitoring (if required)
- The type and purpose of any health surveillance required
- The emergency procedures to be followed in the event of serious/imminent danger or following exposure

Site team staff should complete the online training course allocated via the Trust online training provider. Cleaning staff should sign as having read and understood the Cleaners H&S handbook annually. Records must be maintained.

Those involved in the assessment of Risk should complete a suitable risk assessing training course.

## Annex A to WNAT Hazardous Substance Compliance Code

### COSHH Risk Assessment Form (For purchased hazardous substances used for an activity/task)

This form is used to record the findings of an assessment of risk for work activities that use hazardous substances as part of the task/process. The primary risk considered is that to human life. Environmental risks will be considered, and controls applied when using and disposing of the substances.

**For hazardous substances created as part of a process (Such as wood dust) the guidance provided by the department Compliance Code or CELAPPS information should be followed.**

#### Safety Highlight:

- Before completing this form consider if the activity method can be changed to eliminate the use of this substance.
- If not, can the substance be substituted for a less harmful product?
- You need to have the Safety Data Sheet (SDS) to complete this form. Data sheets are available on-line or from the supplier.

<b>Name of Substance/ Risk Assessment Title:</b>		<b>Assessment Number:</b>	
<b>Section/Team:</b>		<b>Assessment Date:</b>	
<b>Location/Main address/site:</b>		<b>Review Date:</b>	

#### Part A Activity and Substance Information

<b>Task Description/Work Activity</b>	
<b>Briefly describe the main purpose of the substance (what does it do) and where the substance is being used/environment used</b>  This must be in accordance with the Safety Data Sheet (SDS) Section1 - Product Use	

<b>Safety Data Sheet (SDS) Attached? Yes/No</b>	
<b>SDS version number</b>	
<b>SDS date issued/revised</b>	
<b>Substance / Product Name</b>	
<b>Trade Name (if applicable):</b>	
<b>Classification of the substance or mixture/label elements</b> - H statements - P statements	
<b>Supplementary label elements</b>	
<b>Composition/hazardous components of substance</b>	

#### **Workplace Exposure Limits (WEL)**

Detail WEL's from the Safety Data Sheet below, if there are none, please state "none" in the boxes below.

<b>15-minute STEL (Short Term Exposure Limit):</b>		<b>8-hour TWA (Time Weighted Average):</b>	
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Further advice on completing your assessment where a WEL may be exceeded may be required. (Alternative methods, substances or air monitoring may be required)

#### **Specific hazards**

Is the substance an asthmagen, carcinogen, muten or has reproductive toxicity? **Yes/No**

If yes, please seek to source an alternative product and re-assess. Where you cannot source an alternative product please seek further advice on completing your assessment.

## Part B How the substance is used and how exposure is likely to occur

Please complete the table below, ensure that you consider all steps associated with the task/process, for example, storage, transport, decanting, diluting, use/application, handling (where there is potential for harm). Detail each step using the rows in column A.

A	B	C	D	E	F	G
Task/process  How is the substance being used?  Detail each step	Physical state - gas, vapour, Liquid, Dust, Fumes  If using a liquid will this generate airborne particles/mists/vapours e.g., if the task involves spraying	Frequency and Duration of Use  Quantity Used e.g., litres	Who will be exposed and how does exposure occur (consider vulnerable groups e.g., expectant mothers)	Routes of Entry (State) e.g., Inhalation, Skin, Eyes, Ingestion	Current Control Measures  Detail existing general controls in place at the time of the assessment  Controls should be adequate for the stated classification and use (check SDS)	Further Control Measures Required  Refer to SDS, labels, trade information and review against current controls  Complete Further Actions Control Log - PART G (below)

## Part C Control Measures – further information

Please complete the items below **where they are used as a required control measure** or state 'Not Applicable or N/A'

### Local exhaust ventilation

<b>Has it been inspected by a competent person? Yes/No</b>	
<b>Has it been deemed as suitable for the task? Yes/No</b>	
<b>Is it being used effectively? Yes/No</b> If No, please state further control measures required	

### General ventilation

<b>General ventilation requirements/information</b> Please provide further details e.g., well ventilated area/room	
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### Personal protective equipment (Information on suitable PPE will be provided in the SDS)

Face mask and respirator	
Visor	
Goggle	
Gloves	
Footwear	
Overalls	
Other	

### Respiratory protective equipment (Information on suitable RPE will be provided in the SDS)

<b>Has it been assessed as providing suitable protection? Yes/No</b> If yes, please provide details	
<b>Is RPE being used effectively? Yes/No</b> If yes, please provide details	
<b>Have suitable cleaning and storage facilities been provided? Yes/No</b>	

### Air monitoring

<b>Is air monitoring required? Yes/No</b>	
<b>Has air monitoring been carried out by a competent person? Yes/No</b>	
<b>Have the results been interpreted correctly and are controls in place? Yes/No</b>	

### Further control measures

Please ensure that you detail any further specific measures for at risk groups, for example, children, young people, new and expectant mothers and staff with existing health conditions and sensitisation.

Lone working risk assessment completed (if applicable).

<b>Restrictions to use / Controlled or limited access</b>	
<b>Incompatibility and reactivity measures</b>	
<b>Fire – Emergency Arrangements/Equipment</b>	
<b>Spillage considerations</b>	
<b>Process/Administrative controls</b>	
<b>Detail any other measures required to control risk</b>	
<b>Training requirements (how staff are provided with information/training on its use)</b>	
<b>Are training requirements adequate and implemented? Yes/No. If no, please provide details of further training/implementation requirements</b>	
<b>Is health surveillance required for those who are likely to be exposed to the substance? Yes/No. If yes, please provide details of health surveillance (e.g., skin, blood, lung function)</b>	

## Part D First aid and Emergency Arrangements

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Call first aider immediately or call emergency services (if concerned). Retain the label/container to provide information to medical staff and have the SDS available for further substance information. Report incident via the WANT incident reporting service desk.

### First aid application for the following routes of entry (information provide in SDS):

Inhalation	
Ingestion	
Skin contact	
Eye contact	
Other first aid details	

### Please detail if any further control measures are required

For example, review and update to the COSHH folder, update to Fire Risk Assessment where required, arrangements in the event of spillage. Detail any other measures that will reduce risk as not identified above (consult the SDS for any further measures required).

## Part E Current Risk Tolerance Classification Declaration

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<b>Exposure is adequately controlled for the substance and activity use to be as low as reasonably practicable when used in accordance with this assessment. Yes/No</b>	
If you have answered "no" to the above and need to use this substance please contact the HSW team prior to use, <b>please detail other measures to be taken</b> e.g., prevent use until further control measures are in place	

**Part F Sign off and approval to use the substance in accordance with the above controls:**

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<b>Assessor names</b>	
<b>Assessor signatures</b>	
<b>Manager name</b>	
<b>Manager signature</b>	

**Part G Further actions control log**

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<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>
<b>Element of task/process</b>  As detailed above in part A, column A	<b>Actions:</b> - Outstanding risk controls required to reduce exposure	<b>Person(s) responsible</b>	<b>Target date for action</b>	<b>Progress (summary) on actions</b>	<b>Date actions completed</b>	<b>Date controls implemented</b> and part B, column F updated (as above)

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