



**Leicestershire
Traded Services**

Risk Assessment Procedure

Information and Guidance

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**We can
do that. ✓**

Table of Contents

Table of Contents	2
1.0 Introduction.....	3
2.0 Roles and Responsibilities.....	3
3.0 Types of Risk Assessment	5
4.0 Generic Risk Assessment Form	8
5.0 Identifying Activities.....	10
6.0 Identifying Hazards	11
7.0 Who Might be Harmed and How?	12
8.0 Existing Control Measures.....	12
9.0 Initial Risk Rating	13
10.0 Further Control Measures.....	14
11.0 Residual Risk Rating	15
12.0 Action Required	15
13.0 Non-routine / Emergency Consideration.....	15
14.0 Communication of Risk Assessment.....	15
15.0 Risk Assessment Review	16
16.0 Further Information	17
16.1 Further information relating to the risk assessment methodology can be obtained by contacting the Health, Safety and Wellbeing Team on 0116 305 5515.....	17
Appendix 1: Risk Assessment Form.....	18
Appendix 2: Hazard / Activity Matrix	21
Appendix 3: Risk Assessment Briefing Form	22

1.0 Introduction

- 1.1 **Highgate Primary** is committed to protecting the health, safety and welfare of its employees and others affected by their undertakings. In order to ensure that risks to employees are identified and controlled at the earliest possible opportunity, risk assessments need to be conducted as required by various pieces of H&S legislation.
- 1.2 The Management of Health and Safety at Work Regulations 1999 states that:
- Every employer shall make a suitable and sufficient assessment of:*
- a) the risks to the health and safety of his employees to which they are exposed whilst they are at work; and*
 - b) the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertakings.*
- 1.3 This procedure document sets out the arrangements in place within **Highgate Primary** to ensure compliance with appropriate legislation regarding risk assessment. It also provides guidance to assist risk assessors to conduct suitable and sufficient risk assessments, determine and implementing suitable control measures and thus, reduce the risk of potential accidents and incidents.

2.0 Roles and Responsibilities

- 2.1 In accordance with the Management of Work Regulations 1999 the *employer* is responsible for risk assessing within their organisation. At **Highgate Primary** this responsibility is delegated through the hierarchy to appropriate employees/management as described below:

2.2 Head Teacher / Principal

The Head Teacher / Principal is responsible for:

- Ensuring that the HS&W Policy is fulfilled within the organisation. In order to achieve this, sufficient resource should be allocated, proportionately by **School Business Manager**, through the management hierarchy, to enable the effective management of health and safety in all service areas of **Highgate Primary**.

2.3 Chair of Governors and Governing Bodies

It is the responsibility of the Governing Body to ensure:

- That Heads of Department, Managers, Head Teacher/Principal and Supervisors risk assess all work activities/processes under their control, where significant risk is identified. Where a risk has been identified, Head Teacher/Principal should ensure that appropriate control measures are implemented to reduce the risk so far as is reasonably practicable.

- That all persons with designated responsibility to carry out risk assessments are competent to do so and have received adequate training.
- That the findings of all risk assessments are communicated to persons who may be affected by the work activity.

2.4 Heads of Department, Managers and Supervisors

Heads of Department, Managers, and Supervisors are responsible for ensuring:

- The planning, co-ordinating, conducting, monitoring and reviewing of risk assessments within their respective Departments. **Note: Risk assessments should be conducted in conjunction with appropriate staff members that actually carry out the activities being risk assessed as well as by staff that have received risk assessment training.**
- That all work activities/processes within their control should be risk assessed where there is a hazard(s) present.
- Employees are consulted on the risk assessment and the risk assessment is communicated to those affected by the activity/process. This process should be documented.
- That a risk assessment is undertaken prior to the introduction of new equipment or changes in the working practices.

2.5 All Employees

All employees within **Highgate Primary** are responsible for:

- Co-operating and engaging in the risk assessment process with management.
- Familiarising themselves with and adhering to the controls stipulated in the risk assessment process (as appropriate to the activities they engage in).
- Ensuring that controls designed for their safety (such as PPE and machine guarding) are maintained and not tampered with. Where necessary defects should be immediately reported to the appropriate responsible person.
- Communicating with their manager if they have concerns with the risk assessment or identify any further hazards or risks during their work activities.

3.0 Types of Risk Assessment

3.1 Depending upon the activities / processes being risk assessed, there may be a need to approach risk assessments in different ways. Generally, there are 3 types of risk assessment:

- Generic,
- Specific and
- Dynamic.

The different risk assessment types are discussed below.

It should be noted that model risk assessment can be used as a starting point, but these must be developed and be made site specific.

3.2 Generic Risk Assessment

A *generic* risk assessment may be carried out at **Highgate Primary** where activities, although are carried out at different times and locations, may still present the same hazards and risks. For example, general classroom risk assessments as activities are carried out in the same setting. This would mean that the same *generic* risk assessments can be used in all establishments where the activities are the same. Hazards may be included in the generic risk assessment as a result of accidents and incidents which have occurred within a service. Once an accident has occurred, it becomes *reasonably foreseeable* that it may occur again in future.

3.3 Specific Risk Assessment

A *specific* risk assessment should be conducted for activities where the hazards faced by staff differ at each site. For example, a Design and Technology department may have different machinery; different activities within different locations, therefore presenting different hazards, e.g. pillar drill will require a specific risk assessment. Template assessments for design technology and science departments can be found by following the links below:

Science risk assessments:

<http://science.cleapss.org.uk/Resources/Supplementary-RAs/>

Design & Technology Risk Assessments:

<http://dt.cleapss.org.uk/Resources/All/?Search=risk+assessment>

These risk assessments should not be perceived as final live assessments ready for use. These model templates should be made site specific and be distinguishable as the school's own assessment once they have been made site specific. This is due to different workplaces presenting different hazards.

3.4 Dynamic Risk Assessment

A *dynamic* risk assessment may be conducted in circumstances where there is a requirement for staff to deviate from stipulated controls on the grounds that the above *generic* / *specific* risk assessments become irrelevant owing to changing circumstances. A dynamic risk assessment will only usually be required in emergency situations. Where a dynamic risk assessment is likely to be required, this will not need to be written down owing to the potential urgency of the situation. Staff will need to be of a high level of competence to assess the situation in hand and make impulsive decisions to ensure the safety of themselves and others affected by their actions.

A dynamic risk assessment may be required, for example, when a youth worker enters a situation where a gang of young people become aggressive. The particular location may restrict the ability for the youth worker to escape. In this situation, the youth worker may decide to apply alternative controls not stipulated in the specific risk assessment for working with gangs. This assessment is conducted mentally and impulsively by the youth worker and does not need to be recorded.

3.5 Other Types of Risk Assessment

There are occasions where there is a requirement to undertake additional risk assessments. These include individuals (e.g. young persons with challenging behaviour), during emergency / non-routine circumstances or as a result of a specific piece of HS&W legislation.

3.6 *Individual risk assessments* should be conducted where activities involve disabled people, young people (under 18) or new and expectant mothers. These assessments will need to be carried out with the individual present and the manager to ensure that they are familiar with the necessary controls.

3.7 *Emergency / Non-routine* risk assessments may be incorporated into all of the above assessment types or may be a completely separate assessment. It is good practice to consider what controls may need to be in place in the event of a non-routine / emergency situation. For example, while routing cables through a building, an electrical installations engineer may accidentally drill through a wall containing hazardous asbestos material. Good practice would be to assess the potential risk of this happening in order to decide what controls would need to be in place should such an incident occur. Note: Assessments of emergency circumstances should focus on areas where there is a potential significant harm. The risk assessment form in [Appendix 1](#) will assist managers in planning for Emergency / Non-routine scenarios.

3.8 Specific Legislation requiring specific risk assessments to be conducted include, but is not limited to:

- First Aid at Work Regulations, (1981) – First Aid Needs Risk Assessment
- Regulatory Reform (Fire Safety) Order (2005) – Fire Risk Assessment
- Manual Handling Operations Regulations (1992)
- Display Screen Equipment Regulations (1992)
- Control of Vibration Regulations (2005)
- Control of Substances Hazardous to Health Regulations (2002)

- 3.9 Note: Assessments of this kind will not need to be conducted unless it is foreseeable that somebody may be affected by the appropriate hazards.
- 3.10 If further advice is required in conducting the above assessments then the Health, Safety & Wellbeing Service can be contacted, 0116 305 5515.

4.0 Generic Risk Assessment Form

- 4.1 In order to ensure that risk assessments are completed in accordance with a standard requirement the Health, Safety and Wellbeing Team have produced a generic risk assessment form for risk assessors to complete. An example of this form can be found below and in [Appendix 1](#). Guidance on completing this form is given in section [6.0](#).



Activities Covered by this Assessment			
Site Address / Location	Department / Service / Team	CFS and Traded Services	
Note: A person specific assessment must be carried out for young persons, disabled staff and new and expectant mothers conducting this activity			

Hazard (Something with a potential to cause harm)	Who might be Harmed & How?	Existing Controls (Consider Hierarchy of Control)	Initial Risk Rating (S x L)			Further Controls Required (Consider Hierarchy of Control)	Final Risk Rating (S x L)			Action Required		
			Severity	Likelihood	Risk Rating		Severity	Likelihood	Risk Rating	Who (Initial)	Date By: (---/---/---)	Done ?
		<ul style="list-style-type: none"> Example 	H	M	L							

[illegible]

During this activity, what could go wrong resulting in an emergency situation?	
How could this emergency situation be prevented / controlled?	
Who should respond to a potential emergency situation and how? Have staff been trained to respond to this emergency situation?	
Could any non – routine changes affect the safety arrangements in place for this activity? (E.g. weather, people, equipment etc.) What can be done?	

Risk Assessor (s) Name(s):		Risk Assessor(s) Signature (S):	
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RA1/PB/HSW/2012 – Version 3

Authorised By:		Authoriser Signature:	Initial
Date Conducted:		Date of Next Review:	
		Date of Review:	
		Date of Review:	
		Date of Review:	
		Date of Review:	

Potential Severity of Harm	High Death, paralysis, long term serious ill health.		Medium	High	High
	Medium An injury requiring further medical assistance or is a RIDDOR incident.		Low	Medium	High
	Low Minor injuries not resulting in any first aid or absence from work.		Low	Low	Medium
			Low The event is unlikely to happen.	Medium It is fairly likely to happen.	High It is likely to happen.
			Likelihood of Harm Occurring		

RA1/PB/HSW/2012 – Version 3

- 5.4 In using the Hazard/Activity Matrix (above), a risk assessor is visually able to ensure that all hazards associated with an activity are included in the risk assessment. The activities undertaken by a service should be recorded in the left-hand column and the associated hazards may be marked accordingly. This also supports the assessor / responsible person in demonstrating that an effort has been made to consider all potential hazards if questioned by an external regulator.

6.0 Identifying Hazards

- 6.1 The first stage of the risk assessment process is to identify the hazards which staff are faced with when conducting their activities.
- 6.2 A hazard is described as “*anything with the potential to cause harm.*” So therefore, it may be necessary for a risk assessor to liaise with staff who are involved with the activity being assessed. This will help to find out what may cause harm. Some hazards may be obvious, however staff involved with the activity will be able to inform of additional, less obvious hazards.
- 6.3 Generally, hazards can be categorised into 5 types. These are:
- Physical,
 - Chemical,
 - Biological,
 - Environmental and
 - Psychological
- 6.4 Examples of the hazards which fall under these categories can be found on the Hazard /Activity Matrix in [Appendix 2](#).
- 6.5 Once the hazards associated with an activity have been identified, they should be recorded in the left hand column (one hazard per row.) of the [Risk Assessment Form](#). An assessment of each hazard should occur.
- 6.6 When determining which hazards to include, it is important to focus only on those which may present a *significant risk* of harm.
- 6.7 It may also be necessary to identify hazards as a result of previous incidents. For example, if there have been several accidents relating to violence and abuse from pupils/students, then it is reasonably foreseeable that staff may be exposed to violence and abuse. This therefore should be factored into the risk assessment.

7.0 Who Might be Harmed and How?

- 7.1 When determining who might be harmed and how, it is important to consider all staff, pupils/students, and any other person that may be affected by the activity or an omission of control measures associated with that activity including contractors or support staff on site.
- 7.2 Note: People behave in many differing ways and in some circumstances; people that you may not expect to be in the work proximity may surprise you. A typical example of this might be a Tree Surgeon working with a chainsaw in an isolated area, displaying warning signs and within a cordoned off area segregated from the public. It has been known for Tree Surgeons to be tapped on the shoulder by local residents who are asking for some advice regarding the trees over hanging in their gardens. This may have obvious, unpleasant consequences. Efforts should be made to plan for such unforeseen changes to the working environment to accommodate this.
- 7.3 When all persons have been identified, they should be recorded in column 2 of the Risk Assessment Form next to the appropriate hazard. Typical examples of people to consider include:
- Staff,
 - Pupils / Students,
 - Parents / Visitors,
 - Service Users
 - Contractors,
 - Members of the Public,
 - Trespassers etc.
- 7.4 When discussing how the above-mentioned people might be harmed, you should describe the likely types of accident / incident and the potential consequences of this accident / incident occurring, for example roof works in a school:
- “Staff, children, parents and visitors may be injured as a result of contact with falling items. This may result in bumps/blows, fractures and potentially death.”*
- 7.5 This will help to focus efforts appropriately when preventing possible accidents and incidents.

8.0 Existing Control Measures

- 8.1 In the third column of the Risk Assessment Form, list all of the control measures you have in place relating to the particular hazard. For example, if the hazard is slips and trips in a school corridor, the controls may include: “keep left” policy, discipline procedure for disorderly behaviour and no trailing cables etc.
- 8.2 Do not list control measures that are not in place. This may potentially expose a manager in the event of an accident resulting in civil claims or an external regulator

investigation. Similarly, if you do document control measures, you must ensure that they are implemented.

9.0 Initial Risk Rating

- 9.1 Once the hazards, people who may be harmed and existing controls have been identified, it is time to calculate the *initial risk rating*. This helps to determine whether or not the risk of injury is acceptable or whether further action is required to reduce the level of risk to an acceptable level.
- 9.2 A tool has been devised to help managers calculate the risk rating. This tool (see diagram below) follows the Health and Safety Executive's (HSE) approach in determining the risk rating.

Risk Rating = Severity of Injury x Likelihood of Harm occurring.

Potential Severity of Harm	High Death, paralysis, long term serious ill health.	Medium	High	High
	Medium An injury requiring further medical assistance or is a RIDDOR incident.	Low	Medium	High
	Low Minor injuries not resulting in any first aid or absence from work.	Low	Low	Medium
		Low The event is unlikely to happen.	Medium It is fairly likely to happen.	High It is likely to happen.
		Likelihood of Harm Occurring		

Risk Rating Definitions	
Low	This is an acceptable level of risk. No further controls are required as the risk rating cannot be reduced any further. However, it is advised that continual monitoring occurs in order to ensure that no changes / deviation of control measures occur.
Medium	It is advised that further controls are implemented to reduce the risk rating to as low a level as possible. If the risk cannot be reduced to lower than a medium, then on site monitoring should occur to ensure that all stipulated controls are being adhered to.
High	This is an unacceptable risk rating. Urgent interim controls should be implemented to reduce the risk so far as is reasonably practicable. If the risk rating cannot be reduced to lower than a High , then a documented safe system of work should be implemented to control the activity. It may be necessary to seek further professional advice. Serious considerations should be given to the validity of carrying out the activity at all. Regular monitoring of the activity should occur.

- 9.3 It is important to document how you arrive at the risk rating. This helps you to determine where further efforts may be made to reduce the level of risk. I.e. reduce the impact of an injury or reduce the likelihood of it occurring. For example, if there was a high likelihood that a member of staff could be pricked by a used syringe and the severity of such an injury could result in serious long-term ill-health or death, the risk rating will be:

High Likelihood x High Severity = High Risk Rating.

- 9.4 Regardless of how likely the potential for contact with a used syringe is, the severity will always be high. However, it is possible to implement further controls to reduce the likelihood of the event occurring. As such, in this example, efforts should be made to reduce the likelihood of harm occurring.

- 9.5 Once risk ratings have been calculated, they should be recorded in the appropriate (4th, 5th and 6th) columns of the Risk Assessment Form.

10.0 Further Control Measures

- 10.1 Where risk ratings portray that an activity is a Medium or High risk, efforts need to be made to reduce the risk rating to as low a level as *reasonably practicable*. This entails implementing further control measures.
- 10.2 In order to determine which control measures are most effective, the following risk control hierarchy should be followed:
- **Eliminate** the hazard, (For example, replacing a hazardous substance with a non-hazardous one).
 - **Reduce** exposure to a hazard, (For example, conduct a swimming lesson in shallower water or apply the use of segregation ropes).
 - **Isolate** the hazard(s), (For example, preventing access to children into a school kitchen).
 - **Control** the hazard by implementing a safe system / method of working. (For example, a step by step procedure for informing / training grounds maintenance staff on how to spray pesticides safely).
 - **Protect** staff from a hazard by issuing Personal Protective Equipment (PPE).
 - **Discipline** staff for deviating from planned arrangements.
- 10.3 Deciding on suitable control measures may be difficult and a risk assessor would need to balance the benefit of further controls against the *time, cost* and *effort* of implementing them. For example, it would not be reasonable for a sole trader to spend thousands of pounds on an elaborate scaffolding system to assist with changing a light bulb. It may be reasonable however, to develop a safe system of work for using stepladders and ensuring that the sole trader has the knowledge to use the ladders correctly. Similarly, it would be unreasonable for a contracting organisation with a multi-million-pound turnover to not supply staff with disposable hearing protection in a noisy site environment.
- 10.4 In some circumstances, it may not be easy to reduce the risk rating to a *low* level. In these instances, it is important to reduce the level to as low as is reasonably possible. You may need to record on the risk assessment (in the *Further Controls* column), words to the effect of:
- “Reasonable further controls will not reduce the overall risk rating.”*
- 10.5 It would then be necessary to ensure that a safe system of work is documented and implemented. Direct supervision of the safe system of work may also be necessary to ensure that staff are working in accordance with the stipulated arrangements.
- 10.6 Risk assessors should consult best practice guidance in determining suitable control measures. Such guidance may be available through trade associations, the HSE website and experienced technical consultants.

11.0 Residual Risk Rating

- 11.1 Once further controls have been implemented, the risk rating should be revised to demonstrate that the further controls have reduced the risk to as low a level as possible. If the risk rating remains the same after controls have been put in place, then the controls are either ineffective or the risk is already at its lowest possible level. Generally, the residual risk rating will show an improvement after further controls have been implemented. The residual risk rating should be calculated as defined in section [9.0](#). This should be recorded in columns 8, 9 and 10 of the Risk Assessment Form.

12.0 Action Required

- 12.1 In the final three columns of the Risk Assessment Form, it is important to record who is being assigned with the task of implementing the further action, when the action needs to be taken by and whether or not it has been done. For example, a manager (Joe Bloggs) may need to arrange for some further training to help in controlling the risks of manual handling to staff. The final column should be ticked when completed. Hence, the columns would read:

Who: (Initial)	Date By: (--/--/--)	Done? ✓/✗
J.B.	01.01.16	✓

- 12.2 The accumulation of all of the actions identified within the risk assessments would help to form an action plan for a head teacher/principal/manager to demonstrate an intention for *continual improvement*. It is important that where actions have been identified, they are not ignored. You must be able to demonstrate that actions have been taken.

13.0 Non-routine / Emergency Consideration

- 13.1 At the end of the Risk Assessment Form, there are four questions to help the risk assessor identify potential solutions to unforeseen circumstances. It is recognised that things don't always go according to plan. As such, these questions are designed to help staff plan and prepare for what to do in a *worst-case scenario*. For example, a catering assistant may suffer a severe burn in a kitchen while preparing food. Trying to plan for this in the risk assessment process might ensure that staff are aware of how to respond in a timely fashion. This may potentially reduce the effects of the injury and ensure that appropriate medical treatment is sought. Such procedures should be tested periodically as proportionate to the nature of the hazard.

14.0 Communication of Risk Assessment

- 14.1 A key requirement of H&S legislation is the effective communication of risk assessment findings with all appropriate staff. This can be done initially by involving all staff in the risk assessment process. However, the outcome of the risk assessment also needs to be explained to staff. When communicating the risk assessment with staff, it is not always

necessary for them to be fully conversant with the assessment itself. The key points to convey are:

- Who conducted the risk assessments? (Include front-line staff)
- Hazards present and how staff may be harmed when conducting activities.
- Controls / Procedures that need to be followed,
- Communication Methods to raise additional hazards with Managers if necessary. (Report to Line Manager etc.)

- 14.2 Records of risk assessment communication should be kept to evidence who has been briefed and also to identify who hasn't. The Risk Assessment Briefing form ([Appendix 3](#) below) may assist managers / risk assessors in documenting the risk assessment communicators. Note: the risk assessment content will need to be communicated to new starters and to all staff when changes to the assessment are made.

15.0 Risk Assessment Review

- 15.1 Once the assessment is complete, it is important that the form is signed and dated by all assessors and authorised by the appropriate responsible manager. A suggested review date should also be documented on the form.
- 15.2 During a risk assessment review, it is important to check that all of the information on the form is still relevant to the activities being assessed. Consider whether the activities have changed, whether additional controls have been identified since the initial assessment and check that all identified further actions have been ticked off as complete. Any outstanding actions will need to be implemented.
- 15.3 The frequency of a risk assessment review may vary depending on the nature of the task, the potential injury severity, and the resources available to conduct the review. (insert School name) should review risk assessments annually or:
- If a significant operational change occurs, (for example, a new item of equipment)
 - If there has been an accident, (this may suggest that the controls in place were insufficient)
 - If there have been revisions to best practice guidance / legislation,
 - Change in the workforce, (for example, young / disabled employees) or
 - Following an audit or inspection that has highlighted significant weaknesses in the safety management system.
- 15.4 It is good practice to record the revisions / changes to the risk assessment during the review process. This may be noted on the Risk Assessment Form by hand or could be integrated into a formal document control procedure.
- 15.5 Once a risk assessment has been reviewed the previous digital copy of the assessment should be archived. The reviewed version should then be put into a live file and be communicated to all concerned parties. This will assist in demonstrating continual improvement at each review.

16.0 Further Information

- 16.1 Further information relating to the risk assessment methodology can be obtained by contacting the Health, Safety and Wellbeing Team on 0116 305 5515.

Appendix 1: Risk Assessment Form

Activities Covered by this Assessment			
Academy Name and Address:		Department / Service / Team	
Note: A person specific assessment must be carried out for young persons, disabled staff and new and expectant mothers conducting this activity			

Hazard (Something with a potential to cause harm)	Who might be Harmed & How?	Existing Controls (Consider Hierarchy of Control)	Initial Risk Rating (S x L)			Further Controls Required (Consider Hierarchy of Control)	Final Risk Rating (S x L)			Action Required		
			Severity	Likelihood	Risk Rating		Severity	Likelihood	Risk Rating	Who (Initial)	Date By: (--/--/--)	Done ?
		<ul style="list-style-type: none"> Example 	H	M	L							

To add more rows to the risk assessment, place the cursor within the last row right click and select insert row below.

During this activity, what could go wrong resulting in an emergency situation?	
How could this emergency situation be prevented / controlled?	
Who should respond to a potential emergency situation and how? Have staff been trained to respond to this emergency situation?	
Could any non – routine changes affect the safety arrangements in place for this activity? (E.g. weather, people, equipment etc.) What can be done?	

Risk Assessor (s) Name(s):		Risk Assessor(s) Signature (S):		
Authorised By:		Authoriser Signature:		Initial
Date Conducted:		Date of Next Review:		
		Date of Review:		
		Date of Review:		
		Date of Review:		
		Date of Review:		

Potential Severity of Harm	High Death, paralysis, long term serious ill health.	Medium	High	High
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High	This is an unacceptable risk rating. Urgent interim controls should be implemented to reduce the risk so far as is reasonably practicable. If the risk rating cannot be reduced to lower than a High , then a documented safe system of work should be implemented to control the activity. It may be necessary to seek further professional advice. Serious considerations should be given to the validity of carrying out the activity at all. Regular monitoring of the activity should occur.

Appendix 2: Hazard / Activity Matrix

The hazard activity matrix may be completed by staff and managers to demonstrate consideration of the hazards which may be associated with particular activities. Record any additional hazards in the table overleaf.

[illegible]

Appendix 3: Risk Assessment Briefing Form

Name of Manager / Supervisor Giving Briefing:	
Position:	
Date:	
Time / Duration:	
Health and Safety Briefing Location:	

Delivering the Briefing

Aim: To ensure that all staff are familiar with the hazards present, required control measures and mechanisms for raising awareness of any additional workplace hazards.

Objectives: Manager and other Risk Assessors to verbally inform team of the risk assessment documents. Managers and Assessors to invite feedback in order to improve risk assessment and controls where necessary.

Things to Discuss:

- Who conducted the risk assessments? (Include front-line staff and managers)
- Activity / Hazard Matrix – (Any additional Hazards not considered?)
- Hazards present and how staff may be harmed when conducting activities
- Controls / Procedures that need to be followed (Refer to risk assessments)
- Methods to raise additional hazards with Managers if necessary (Report to Line Manager etc.)

Report feedback from Staff

Invite questions to help ensure that staff are familiar with the hazards, controls and procedures. List any concerns raised in the box below for further consideration:

Issue / Question Raised	Staff Name	Answer Given	Further Action Required	Date of Action

Double Check: Staff should be familiar with location of Risk Assessments for future reference. Check all staff have access to appropriate equipment / tools to conduct their work safely. Ask them to recite the methods for raising awareness of a particular hazard which

Feedback to Management: Any identified issues with risk assessment / controls, PPE, equipment required, clarity of procedures, any absent personnel etc. Seek approval for further action if necessary.

[illegible]