


Risk Assessment Form

Corporate Health, Safety and Welfare Management System

Description of the task/activity:	Covid-19 School based teaching / administration and sanitation tasks. Remote teaching / administration tasks for those temporarily working off site.	Location:	Goodmayes Primary School
Name of person(s) completing assessment:	Samina Jaffar	Job title(s):	Headteacher
Local reference no:	317-2023	Risk Register No:	6
Date of this assessment:	26/08/20	Date of signing:	26/08/20
Date of next Review:	Review required if there is a significant change or Government guidance changes or increase in year groups attending/numbers of pupils	Signed by (Department Manager):	<i>Samina Jaffar</i> 

What is the hazard?	Who/what could be harmed and how?	Initial Risk Rating H/M/L	What effective control measures are currently in place?	Residual Risk Rating H/M/L Controls in place? Yes/No	ACTION PLAN
Being infected by the Coronavirus	Staff in public-facing roles Pupils on site Risk from environmental exposure, exposure to persons, transmission from touching contaminated objects.	H	Staff and pupils who are extremely clinically vulnerable can return to school/work, except for those exempt with medical evidence, which includes people over the age of 70, pregnant women and those certain medical conditions listed in the social distancing guidance should stay at home as much as possible, and if they do go out take particular care to minimise contact with others. All high traffic areas to have contactless sanitizer dispensers	L YES	Staff and pupils who fall under the identified categories or other circumstances as agreed in discussion with Headteacher/WF(DHT) can return to work/school. Headteacher to carry out individual risk assessment.

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			<p>PPE is only needed in a small number of cases:</p> <ul style="list-style-type: none"> - Children, young people and students whose care routinely already involves the use of PPE due to their intimate care needs should continue to receive their care in the same way. - If a child, young person or other learner becomes unwell with symptoms of coronavirus while in their setting and needs direct personal care until they can return home. A face mask should be worn by the supervising adult if a distance of 2 metres cannot be maintained. Even if a distance can be maintained PPE should still be worn at the point of pupils displaying possible symptoms and by staff who will be managing this. If contact with the child or young person is necessary, then gloves, an apron and a face mask should be worn by the supervising adult. If a risk assessment determines that there is a risk of splashing to the eyes, for example from coughing, spitting, or vomiting, then eye protection should also be worn. - Staff who are clinically extremely vulnerable follow use of PPE as identified on their individual risk assessment. - Any member of staff or pupil who have suspected Covid-19 symptoms to arrange a test and if tested positive to refrain from coming into school for the isolation period. Letter will be sent to all parents and LA informed. If positive the identified bubble will be sent home. <p>Follow update from LA on Schools "Sickness Policies" to ensure that staff and pupils that are displaying symptoms of</p>	<p>AR (Caretaker) to order and fix dispensers in identified high traffic areas.</p> <p>KLB (SENDCo) to share guidelines with staff in the use of PPE in the Lighthouse</p> <p>PPA room identified as isolation room for staff / pupils with Covid-19 symptoms, log to be kept of anyone who has visited. First aider on a rota. Staff/pupils to exit from KS 2 gate.</p> <p>AR (Caretaker) to ensure sufficient supply of disposable gloves and anti-bacterial wipes/cleaning materials for each classroom. Continue to review supplies in school and make sure there is enough in stock. Classrooms used to have a working sink for regular hand-washing.</p> <p>Non-contact temperature thermometers obtained for medical room and extra for possible use on entry to school, where staff or pupils present high temperature symptoms (with consent).</p> <p>Headteacher to include this in letter to parents. WF (DHT) to manage and oversee Track and Trace. Mrs Sharma to arrange to update entry system to reflect information as required by Track and Trace.</p>
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			<p>COVID-19 are excluded from the school site until confirmed to be COVID-19 free by testing.</p> <p>Where there is an incident of an outbreak of Covid-19 in school, LA and PHE will be informed and school to follow advice/instructions given. Template letters provided by LA will be sent out to parents/carers in line with guidance.</p> <p>All staff will be informed by email / SchoolPing / Zoom meeting, depending on the best/ most immediate method and the contingency plans for remote or Blended learning will be put into action.</p> <p>Parents informed that children will not be able to bring personal items to school e.g. toys, books games.</p> <p>Follow update from LA on Schools "Sickness Policies" updated to ensure that staff and pupils that have someone in their household displaying the symptoms of COVID-19 are excluded from the school site for 14 days.</p> <p>Ensure procedures for Track and Trace are stringently followed.</p> <p>Identify children returning to school who are clinically extremely vulnerable and support them to return to school with an individual risk assessment</p> <p>Identify children returning who are clinically vulnerable. Parents to seek medical advice that it is safe for them to return to school.</p> <p>Apply PHE social distancing and all other precautions (this includes inside vehicles when applicable)</p>	
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SJ - ensure all contact names and numbers held for contacts at LA and PHE re any outbreak.
Template letters modified with school logo etc.
WF - to draft a communication to all staff to be sent if/when needed.
All staff across each year group have in place resources for remote learning.

Order plastic wallets for each child to replace book bag.

ES (Headteacher's PA) to follow up with LA re updates on Sickness Policy.

WF (DHT) to prepare recording system.

KLB (SENDCo) to identify children who fall in the clinically extremely vulnerable and clinically vulnerable categories and carry out risk assessment in collaboration with parents and class teacher.

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			<p>https://www.gov.uk/government/organisations/public-health-england</p> <p>If any face to face conversation becomes threatening, dynamically assess the risk and, if necessary walk away and contact a member of SLT.</p> <p>Strict staggered entry and pick up introduced in each phase to minimise gatherings and numbers of parents on site. Where there are siblings in different phases, parents will drop off all siblings following drop off and pick up times for the youngest child.</p> <p>Pupils on entry go straight to their class Bubble (continue with soft start as less congestion). Wash hands then be seated at tables positioned forward facing away minimising contact from peers. Pupils to work from the same desk, whilst in the classroom.</p> <p>Staff on entry to tap in on entry system, sanitize hands and keep safe distances apart and sign for staff reminding them about not entering if family members displaying Covid-19 symptoms.</p> <p>Staff must wash their hands regularly and keep safe distances apart up to at least 2 metres</p> <p>If a member of staff or pupil becomes ill / shows COVID-19 symptoms they should go home and follow the stay at home guidance. PPE should be worn by staff caring for the child or adult while they await collection</p> <p>Following any incident of which a member of staff or pupil becomes unwell the work area / isolation room will be</p>		<p>Provide staff with a clear protective screen in the main Reception area. Limit sharing of office spaces; staff to work in different rooms/ spaces where possible, to minimise contact. Purchase protective screen for AHT Office.</p> <p>Staff to use internal phones as much as possible for communication.</p> <p>Breaks to be staggered for all groups of pupils in different year groups.</p> <p>Parents informed that drop off will be at the gate. Place spots/markers for parents/carers in playground for picking up times (up to 2 metres apart) and in Reception area. Only one parent allowed to drop off or collect at any given time using one-way system.</p> <p>WF(DHT) to inform Caretaker of any incidents to ensure room/s is deep cleaned. Headteacher to send out letter to parents to inform the school if their child/family member has displayed Covid-19 symptoms not to send their child/ren in. WF(DHT)/Headteacher to</p>
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			<p>cleaned in accordance with the Government's advice Covid-19 decontaminations in a non-health care setting.</p> <p>All surfaces and objects bacterially cleaned after use in all rooms. Telephones and computer keyboards wiped with bacterial cleaner daily if in use.</p> <p>A first aider should always be on site including a paediatric first aider.</p> <p>Rooms that are too small will not be used. The DfE guidance states primary aged children cannot be expected to social distance. Classes will have up to 30 with children on tables facing forward. Staff must follow social distancing guidelines.</p> <p>Windows/doors in classes to be kept open for ventilation (except for fire safety doors).</p>		<p>follow up with pupils/staff who have been in school that display symptoms to ensure a test is taken and results shared with WF(DHT)/Headteacher. Bubble with staff/pupil to then self-isolate for 14 days. Letter as provided by LA to be sent out to parents where confirmed case of Covid-19.</p> <p>One-way system where possible for moving around the School for pupils and staff. In areas where this is not possible AR to put arrows along corridors and walls to show direction of travel.</p> <p>ES (Headteacher's PA) to check on expiry of First Aid certificates and availability of paediatric First Aider.</p> <p>Staff/visitors to use sanitizer in Reception on entry to school. All visitors/parents to be given an appointment for visits.</p>
	<p>Staff with sanitation duties Cleaning staff and caretakers Risk from environmental exposure, exposure to persons, transmission from touching contaminated objects.</p> <p>Risk from spilled fluids.</p>	H	<p>Staff should always wear PPE (gloves, apron and face masks) and use wipes, etc.</p> <p>Staff who are extremely and clinically vulnerable, which includes people over the age of 70, pregnant women and those certain medical conditions listed in the social distancing guidance take particular care to minimise contact with others.</p> <p>All areas to be cleaned regularly throughout the day and at the end of the working day as per normal procedures.</p>	L YES	<p><i>Needed for environmental exposure:</i> Ready supply of suitable wipes and safe disposal of used wipes, masks in identified bins, regular hand washing, i.e. before and after tasks.</p> <p>Display social distancing posters and give ongoing reminders to children, staff and visitors.</p>

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		<p>Steam cleaners to be available for each year group to be used regularly throughout the day for resources and equipment in Bubbles.</p> <p>If someone becomes unwell while undertaking these duties, with a new, continuous cough or a high temperature and/or change in their sense of smell/taste, inform a member of the SLT, they should go home and seek a test and follow the stay at home guidance.</p> <p>https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings</p> <p>The minimum PPE should be worn when cleaning an area where a person with possible or confirmed coronavirus has been following the cleaning in non-health care settings guidance.</p> <p>Staff should wash their hands with warm soapy water for a minimum of 20 seconds. On arrival at work after each cleaning operation and disposal of materials and again prior to leaving work.</p> <p>Staff should avoid touching their face, nose and eyes.</p> <p>Where contractors and external specialists working with children may be visiting school premises such operations will be assessed in advance by the headteacher or a member of the Senior Management Team to determine whether such work is essential. In cases where work is essential a separate risk assessment will be conducted and communicated for each such operation. Specialist teachers will sign the declaration (on entry sign system) to confirm they are not experiencing COVID 19 systems.</p> <p>All visitors, contractors and specialist teachers on entry sign and confirm they do not have any Covid-19 related symptoms.</p>		<p>Headteacher to employ additional supply cleaners to ensure we have enough availability for high levels of cleaning</p> <p>Headteacher to ensure Midday staff are clear about the actions they should take if a child presents with symptoms compatible with Coronavirus and correct use of PPE.</p> <p>A SLT member to be present on lunch duty to support midday staff.</p> <p>Display posters around school and on gates.</p> <p>AR (Caretaker) to purchase additional identifiable bin liners for disposal of used PPE and placed in separate bin in each room used.</p>
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			<p>H&S Lead have checked that there are posters appropriately placed advising staff of Covid-19 safeguards.</p> <p>Staff should clean regularly touched surfaces, such as door handles and railings, regularly with disinfectant wipes, or a disposable cloth and warm soapy water or normal disinfectant products (e.g. Dettol spray).</p> <p>Apply up to 2 metre social distancing and all other PHE precautions (this includes inside vehicles) https://www.gov.uk/government/organisations/public-health-england</p> <p>Staff should wear appropriate PPE and use wipes, etc.</p> <p>Where staff are cleaning an area with potential contamination from an individual with suspected Covid, disposable gloves and disposable apron should be worn. Where there is visible contamination from body fluids, disposable masks should be worn. Despite this, disposable mask should be worn when cleaning a potentially contaminated area.</p> <p>Staff are briefed, given information and trained where needed on use of the PPE. Records to be kept of this.</p> <p>Ready supply of suitable wipes, safe method of disposing of used wipes, regular hand washing, i.e. before and after tasks.</p>		
<p>Failure to maintain social distancing requirement</p>	<p>Staff / children Proximity - A person catches Covid-19 due to working closely with an infected person.</p>	<p>H</p>	<p><i>Social Distancing</i> procedures have been implemented. All work areas and activities have been evaluated against the possibility to implement social distancing (no handshaking, maintaining a safe distance, no direct contact, deferring large meetings etc.)</p> <p>SLT is familiar with the guidance on implementing protective measures in educational and childcare settings.</p>	<p>L YES</p>	<p>NS (Admin) to send policy to all staff who will sign to say they have read and understood it. NS (Admin) to send updates as policy is reviewed.</p> <p>TAs to display posters around classes reminding of social distancing</p>

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		<p>Staff/children should be reminded to respect social distancing. Daily reminders given by teachers. All staff should model social distancing and teach children to give a sense of space. In particular:</p> <ul style="list-style-type: none"> - Children should sit at their own desk; - Children should have their own stationary and be encouraged to not share equipment or if they need to, clean it between uses; - Children should not queue up for lunch or water fountains but wait on spot and go to the food counter; children to use their personal water bottles - Where children need to queue up they should be reminded to use the spots to keep a safe distance apart - Play equipment used outside – hoops or balls used to be cleaned at the end of a session - Outdoor play equipment e.g. climbing frames will not be used - This information to be passed on to all staff - Ensure visual reminders of social distancing requirement are in place - Dining hall marked to take account of safe social distancing - Packed lunches only to reduce contact with food in the first two weeks of school (21.9.20). - Display posters to highlight respiratory hygiene e.g. coughing sneezing ‘catch it/kill it/bin it’ - A pack of tissues for each child at their table - Bins emptied at regular intervals throughout the day - On the first day back to school, children will be familiarized with the new social distancing and protective measures in place - Lunchtimes and playtimes will be timetabled by identified Bubbles. Each Bubble will have their own set of lunchtime/playtime equipment/resources 	<p>KH (Leader of Learning) – Remind children about the Goodmayes Primary School social distancing song/rap. HP (AHT) prepare timetable for use of staffroom.</p> <p>PGLs to draw up rotas for breaktimes. JJ (Supervisor) for Middays.</p> <p>Teachers & TAs - Rearrange furniture to accommodate forward facing seating arrangement.</p> <p>TAs to display posters.</p> <p>Remove unnecessary items and items that are hard to clean, such as soft furnishings where possible.</p> <p>Headteacher to provide clear protocols for parents e.g. for arrival and collection times.</p> <p>SLT - Video assemblies in class to share consistent messages with children and well-being.</p> <p>Provide plastic wallet/pack of resources for each child. Plan for social distancing in use of shared toilets. Staff to set up system so number of children monitored. Allocate play equipment to each Bubble.</p>
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			<ul style="list-style-type: none"> - PE - each Bubble will have their own set of PE resources/equipment - Bubbles to be allocated different playgrounds to facilitate cleaning - Dining hall cleaned after use by each Bubble. Additional hall to be used for packed lunches to facilitate social distancing - Wet lunchtimes/playtimes in classes <p>Staffroom Provide a separate station for access to a hot water urn and disposable cups to reduce congestion</p> <ul style="list-style-type: none"> - Number of seats available in the staffroom to be limited taking into account social distancing 		<p>Staff to maintain own stationary, cups and cutlery.</p> <p>SK to contact school meals provider for their updated risk assessment.</p>
	<p>Working from home</p> <p>Upper limb disorders, tired eyes, headaches, stress</p> <p>Stress due to a feeling of isolation</p>	M/L	<p>All staff working from home need to ensure that they have assessed their home environment to ensure that it is as safe and suitable for work as possible.</p> <p>Staff should take regular breaks away from their computer/laptop. (e.g. every hour). They should get up, walk around and stretch.</p> <p>They should ensure that their computer screen/laptop screen is at a comfortable height and distance to avoid neck and eye strain. Where possible school equipment to be provided.</p> <p>Staff temporarily working from home because of Coronavirus do not need to complete a display screen equipment workstation assessment.</p>	L YES	DD (Technician)/HS (Admin) – to devise prompt sheet.
<u>Psychological / Staff / Pupil Wellbeing</u>	<i>All Staff - Workload Impacts</i> of the developing pandemic	H/M	Regular information sharing and communication.	L YES	Leaders to continue having weekly Zoom meetings and phone calls for their team.

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	<p>and organisation's response.</p> <p>Stress and anxiety arising through uncertainty and lack of control.</p>		<p>Ensure all staff stay connected to team communications to avoid risks of isolation.</p> <p>We continue to mitigate for Staff and Pupil stress and anxiety through the means of an established counselling service, communication tools and information sharing on staff counselling service in place. https://educationmutual.co.uk/request-help.html (staff to complete a self-referral) or schools Advisor service www.schooladvice.co.uk</p> <p>Regular communications are already well established in the service.</p> <p>Shared distribution of workload regardless of roles to adapt to changing demands.</p> <p>For the pupils specifically affected, a shorter day will be put in place if needed.</p> <p>Support for resilience, mental health and wellbeing for vulnerable and all children:</p> <ul style="list-style-type: none"> - first day in school to familiarise pupils with new procedures, structured discussion around school closure and experiences, use of stories - a programme of pastoral support, more focused where issues are identified - re-establish the extensive extra-curricular activities for all pupils through e.g. after school clubs <p>Tailored PSHE programme of support for pupils.</p>		<p>Continue with staff WhatsApp Group for emotional and social support.</p> <p>Display SAS contact details in staffroom and send to all staff at the start of the school year.</p> <p>KLB to ensure all staff have a bank of resources to support pupils' mental and psychological well-being</p> <p>SJ - ensure teachers provided training on INSET days</p> <p>WF - check class timetables reflect planned opportunities for mental and physical well-being.</p>
	<p>Briefing of Staff</p>		<p>Risk assessment must be communicated to all staff. It should be read and understood by all staff with a record kept as evidence to demonstrate this sharing of knowledge was conducted and reminded during daily briefing during period of School opening.</p>		<p>INSET DAY to set expectations/share protocols, risk assess classes and communicate all protocols to adhere to social distancing guidelines.</p>

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			<p>All risk assessment reviews and updates to be sent out to staff via SchoolPing.</p> <p>Staff to be reminded of handwashing advice and of correct social distancing.</p>		Display hand washing posters.
	Caretaker / maintenance visits		<p>Caretaker to wear PPE, gloves.</p> <p>Adhere to social distancing (up to 2 metres), to not pass keys or any documents etc.</p> <p>Update the school's "Managing Contractors Policy" to ensure that it covers how requirements for contractors attending the school site are symptom free from Covid-19 and that any work required will be delayed until a safe date can be arranged or replaced with another well contractors.</p> <p>All routine maintenance visits and statutory inspections should continue as far as practically possible wherever this can be achieved whilst adhering to all current social distancing guidelines. If works cannot be carried out safely then they should be suspended other than in an emergency. Any repairs to the outside of the building can proceed after they have been risk assessed.</p> <p>Asbestos register to be completed by caretaker.</p> <p>Operatives to wear gloves and be aware of social distancing (up to 2 metres).</p> <p>Caretaker to be advised of risk assessment and signed as acknowledgement. Scanned document if possible.</p>		<p>Headteacher to meet with AR (Caretaker) to share all information and ensure all H&S checks in place.</p> <p>SK (School Business Manager) to review and update Managing Contractors Policy.</p>
Insufficient level of staffing (You may want to consider this, once the	Staff/ Pupils Workload Impacts of the developing pandemic and organisation's response.	M/L	Structure the day so that different groups of children start and finish the school at different times to avoid unnecessary contact and reduce risk.	L YES	Headteacher - Letter to parents providing information on what return to School will look like, drop off and pick up points, times.

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<p>school is re-open. The date for re-opening will depend upon scientific advice).</p>	<p>Not following the social distancing rules.</p> <p>Impact of Covid-19 on identified BAME</p>	H/L	<p>Restrict parental access to the school site at drop off and collection times.</p> <p>Stagger breaks to reduce numbers of people moving around the site at the same time.</p> <p>Restrict and supervise movement around shared areas such as corridors, stairwells and toilets, offices and staff rooms.</p> <p>Children will need to work from individual desks, safe distance away from the next child or adult and remain seated.</p> <p>Pupils will need their own stationery, equipment, books etc should not be shared.</p> <p>Wearing a face covering or face mask in schools or other educational settings is not recommended and the majority of staff will not require PPE. The guidance notes the circumstances in which PPE should be used.</p> <p>BAME staff can be further supported with reasonable adjustments, considering individual health concerns and caring responsibilities.</p> <p>School located in an area with diverse BAME community and staff.</p>	L YES	<p>WF(DHT) – letter to re parents to inform if social distancing not followed intentionally by pupils, they will be sent home. Revised Home School agreement reflects Covid-19 expectations and protective measures</p> <p>Each midday to regularly replenish PPE kit including disinfectant wipes, hand sanitizer.</p> <p>Headteacher to risk-assess staff who fall into any of the criteria identified making BAME groups more vulnerable and make appropriate deployment arrangements on a precautionary basis.</p>
<p>Adhering to social distancing (up to 2 metres) is not realistic to achieve with high needs pupils with EHCP</p>	<p>Vulnerable children and young people</p>	H	<p>Ensure individual risk assessments for pupils with EHCPs are reviewed by senior management team.</p> <p>Sensory Room to be used to accommodate some pupils with EHCP, on a rota basis.</p> <p>As contact with high needs pupils with EHCP is inevitable, allocated staff will wear PPE (gloves and apron) and a face mask where required as outlined in the PPE guidance.</p> <p>Risk Assessment carried out on each pupil with EHC Plan.</p>	L YES	<p>KLB (SENCo) – monitor in Lighthouse and share key information with staff.</p> <p>AR (Caretaker) to place separate identified bins for safe disposal of PPE</p>

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Adhering to social distancing (up to 2 metres)	Transport	H/M	Remind staff travelling on Public Transport to follow regulations as required.	L YES	Headteacher to discuss with parents who live at a distance from the school any alternative arrangements.
Staff not aware of revised Fire evacuation procedures	Staff/Pupils	H/M	Ensure all staff familiar with school's emergency evacuation procedures.	L YES	Headteacher to update staff on fire evacuation procedures on INSET Day.
Teaching and Learning Procedures	<p>Staff /Children Proximity – Transmission of Covid-19 due to working closely with an infected person.</p> <p>Bubbles closed/stress due to a feeling of isolation</p>	H/M	<p>Teacher will consider the content and ways of teaching lessons to ensure that pupils are able to maintain safe distancing as much as possible and they must not share resources.</p> <p>Practical resources will be reduced within the classroom with the work space that enables tables to be forward facing.</p> <p>Minimise contact with books. More opportunities for self-marking.</p> <p>A small group of pupils with health issues may continue to require access to home learning.</p> <p>If bubbles have to closed due to a case of Covid-19, Blended Learning provision will be provided via online platform and Zoom, following E-Safety and Safeguarding guidance.</p>	L YES	<p>Ensure training for staff on Inset day.</p> <p>Assessment Leader to review marking and feedback policy.</p> <p>SLT and PGLs to maintain regular communication to ensure an effective response to pupil and staff mental health and well-being.</p> <p>Ensure all staff are familiar with Policies.</p>
Trips and Visits	<p>Staff / children Proximity – Transmission of Covid-19 due to travel on public transport and within the venue</p>		<p>When considering trips to support learning, minimise travel on public transport.</p> <p>Staff to ensure when carrying out a risk assessment before a trip as part of school procedures to risk assess also against social distancing and protective measures with consideration to Covid-19.</p>		Headteacher and trips coordinator to review and update school's risk assessment for trips and visits.

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Risk Rating Matrix

		Impact				
		1. Very Low	2. Low	3. Moderate	4. High	5. Very High
Likelihood of Harm	5. Almost Certain	5	10	15	20	25
	4. Likely	4	8	12	16	20
	3. Possible	3	6	9	12	15
	2. Unlikely	2	4	6	8	10
	1. Rare	1	2	3	4	5

Matrix to calculate the likelihood and impact should the hazard be realised.

Note:

Inform the Risk and Insurance Manager of all **Medium** and **High** tasks (residual)
 Inform Strategic Health and Safety Board of all **High** rated tasks (>12 (residual))

RAG Rating Matrix

Risk Rating	Possible Action to be Taken
LOW (<4)	<ul style="list-style-type: none"> Department manager may accept risk Manage by routine processes Any costs to be funded within Directorate Hazard to be reviewed and updated at least annually.
MEDIUM (5-10)	<ul style="list-style-type: none"> Management action required to control risk as soon as reasonably practicable Monitor any action taken to ensure it has been effective in reducing the risk to an acceptable level Reviewed and updated at least every 6 months to ensure controls remain effective May necessitate bids for central funding.
HIGH (>12)	<ul style="list-style-type: none"> Immediate senior management action required to further control risk May halt work/task while additional controls are applied Copy of the risk assessment sent to Risk and Insurance Manager for inclusion on to the Corporate Risk Register Responsible Director to give priority for action/funding Monitor any action taken to ensure it has been effective in reducing the risk to an acceptable level To be reviewed and updated at least every month to ensure controls remain effective.