

## **Risk Assessment Policy (Trust including EYFS)**

### **Related Policies**

- Health & Safety Policy
- Risk Management Strategy

### **1. Introduction**

- I. St Bede's School Trust Sussex (hereafter referred to as Bede's) recognises the legal requirement for workplace risk management, as set in the Health & Safety at Work Act 1974 and the legal requirement for workplace risk assessment, as set out in The Management of Health & Safety at Work Regulations 1999.
- II. The process of risk assessment will result in risk control measures and Bede's recognises that in order to manage risk, it must apply reasonable safety precautions in relation to identified hazards and that failing to do so, would be a failure in the duty of care owed to all those in or directly affected by the Bede's workplace.

### **2. Aim**

- I. The aim of this Policy is to set out the systematic approach for suitable and sufficient risk management throughout the organisation, by way of risk assessment.

### **3. Scope**

- I. Risk management must secure the health, safety and wellbeing of persons at work and seek to protect other persons against health and safety risks arising out of or in connection with Bede's activities. Therefore, the application of this Policy extends beyond staff, to the pupils, visitors, contractors and neighbours of Bede's.
- II. This Policy seeks to drive and underpin risk management processes and procedures that ensure pupil welfare is safeguarded and promoted at all times.
- III. The purpose of risk assessment is to identify hazards and evaluate any associated risks. For Bede's, areas of health and safety risk (as examples) include:
  - a) Child protection (i.e. staff recruitment, Estates contractor selection and visitor / contractor supervision)
  - b) Pupil safeguarding (i.e. radicalisation, FGM, attendance, bullying, supervision, medical needs, dietary needs, emotional needs, vulnerability: overseas pupils, or pupils with EAL or SEND, or under Care Plans, or at risk of abduction)
  - c) Pupil boarding (i.e. welfare facilities and arrangements)
  - d) Pupil lessons, activities and events (i.e. science, D&T, sports, pool and gym, Bede's Fest etc)
  - e) Extracurricular demands (i.e. Legat School of Dance and Elite Athletes programme)
  - f) Off-site visits (i.e. excursions, trips, adventurous activities and staff travel)
  - g) Transportation (i.e. minibus service and coach contractor selection)
- IV. The workplace (i.e. routine and non-routine work tasks, equipment, premises, grounds, security, fire and first aid)

- V. In addition, some workplace elements are specifically required by legislation to be risk assessed such as, for example, fire, manual handling, use of display screen equipment, substances hazardous to health, workers under the age of 18 and new or expectant mothers.
- VI. As Bede's has more than 5 employees, it is recognised that the significant findings of risk assessment must be recorded, as must the assessment for any group of employees identified as being especially at risk.

#### **4. Definitions**

- I. For the purpose of this Policy the following definitions apply:
  - a) Hazard: Something with the potential to cause harm
  - b) Risk: The resulting harm (and to whom or what) of the hazard if it came to fruition.
  - c) Risk Evaluation: The assessment of the degree of risk (that could arise from the hazard) based upon the likelihood of the event occurring and the potential likely severity of the consequence.
  - d) Risk Rating: The overall subjective judgement as to the degree of risk (that could arise from the hazard).
  - e) Control Measures: Methods used to eliminate or reduce risks arising from the identified hazards.
  - f) Residual Risk: The degree of risk remaining after control measures have been applied.

#### **5. Responsibilities for Risk Assessment**

- I. All employees are responsible for:
  - a) Assisting with and participating in the process of risk assessment.
  - b) Avoiding any significant hazard, protecting themselves and others from any significant risk and adhering to any risk control measures of which they are made aware.
- II. A risk assessment author is responsible for:
  - a) Completing a risk assessment when they have the competence to do so and collaborating with others to enhance competence where necessary.
  - b) Formulating and implementing control measures and effectively communicating the significant findings to those potentially exposed to the identified hazards.
  - c) Owning the risk assessment and ensuring it is subject to suitable review and retention. This responsibility may become that of another person where they 'adopt' the risk assessment, and in effect, become the 'owner' of the risk assessment.
- III. Heads of Departments / departmental managers are responsible for:
  - a) Ensuring that risk assessments are completed for their departments / areas of control. They may do so by delegating the task to others.

- b) Allocating resources in response to risk assessments completed within departments and determining a course of action should it be identified that a risk cannot be suitably controlled so far as is reasonably practicable.
- c) Setting up frameworks for decision making and corporate strategies which incorporate risk assessment principles. This will ensure that decisions made take into account relevant risk factors.
- d) Ensuring that those who are tasked with completing risk assessments are suitably trained to do so.
- e) Ensuring that a suitable mechanism exists to communicate the safe systems of work identified as part of the risk assessment procedures. Typically, these are likely to be in the form of documented Standard Operating Procedures (SOP), or Bede's own guidelines such as those set out in policies, procedures, handbooks and codes of conduct. But for straightforward hazards, simple controls such as signage alone may be suitable.
- f) Make suitable representation to the relevant SMT or Health & Safety or SMT Committee if risk assessments identify a necessary control measure that cannot be met by the available departmental resources.

IV. The Health and Safety Committee are responsible for:

- a) reviewing key health and safety risks and for maintaining a register of significant risks/issues and actions (with deadlines).

I. The Risk Review Audit Committee are responsible for:

- a) monitoring, reviewing and reassuring the Board that risks at a Trust level, as recorded in the corporate risk register, are being adequately managed by the Executive.

## 6. Competence and Training

- I. Anyone can carry out and produce a risk assessment; there is no required qualification. However, under Section 3 of the Management of Health and Safety at Work Regulations 1992 the Trust has a duty to carry out 'suitable and sufficient' risk assessments.
- II. As risk assessment underpins so much of what we do and many staff across the Trust will undertake risk assessment activities, Bede's is working towards providing all staff with basic risk assessment training and appropriate guidance.
- III. Current arrangements require for example, teaching staff to complete risk assessments for trips and activities. These are checked for their suitability and signed off by the Health and Safety Manager before such trips or activities are undertaken.

## 7. Types of Risk Assessment

- I. Although the principles of assessment remain the same, there are 3 different methods of assessment that are recognised:
  - a) Specific – An assessment of the hazards of a unique item, such a task, activity, substance of harm, room, building or person. Usually documented.

- b) Generic – An assessment of an item that will normally pose the same hazards wherever it is carried out, unless there is something particularly unusual about the environment to impact on the item. Such as a general task or activity like shopping, driving a car on the highway or bowling. Usually documented.
- c) Dynamic – An undocumented mental assessment of risk for an evolving situation that was unplanned or is naturally fluid. It must not replace the requirement for a specific or generic risk assessment and should only be used when delay to produce a documented assessment would increase the risk of harm.
- II. Bede's activities will be subject to both specific or generic and dynamic risk assessment.
- III. There are also risk assessments that the Trust must have in place in order to meet certain regulations. These include for example;
  - a) The Regulatory Reform (Fire Safety) Order 2005
  - b) Control of Substances Hazardous to Health (COSHH) 2002
  - c) Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)
  - d) The Control of Legionella Regulations L8 ACOP
    - a. The Control of Asbestos Regulations 2006
- IV. Please note this list is not exhaustive.
- V. The law requires:
 

*The risk assessment shall be suitable and sufficient, covering both employees and non-employees affected by the employers undertaking (e.g. contractors, members of the public, pupils etc).*
- VI. The term 'suitable and sufficient' is important as it defines the limits of the risk assessment process. A suitable and sufficient risk assessment should:
  - a) Identify the significant risks and ignore the trivial ones;
  - b) Identify and prioritise the measures required to comply with any relevant statutory provisions;
  - c) Remain appropriate to the nature of the work and be valid for a reasonable period of time;
  - d) Identify the risk arising from or in connection with the work and the detail of this should be proportionate to the risk.

## **8. Risk Assessment Process**

- I. Risk assessments do not have to be complicated. The level of detail contained in them should match the level of the risk of the activity and trivial risks should be ignored. In many cases a risk assessment will lead to clarification and the documentation of processes and procedures (as control measures) often already in place. Risk assessments can also assist in the identification of instruction, information, training and supervision that may be required for the activity.
- II. Risk assessment follows a logical process which can be broken down into 5 steps, as described by the HSE:
  - a) Step 1 Identify the hazard
  - b) Step 2 Decide who or what might be harmed and how
  - c) Step 3 Evaluate the risks and decide on precautions
  - d) Step 4 Record significant findings and communicate

- e) Step 5 Review the assessment and update as necessary
  - I. When conducting a risk assessment, authors should consult with and involve staff members who have practical experience of the task, as they will have the best awareness and understanding of the hazards involved in the activity and how the activity is actually carried out. And/or seek specialist input for specialised activities.
  - II. Also, the internet now provides any author with access to a wealth of information, as do organisations such as professional institutions, trade associations and regulatory bodies such as the HSE, and research should form a component of Steps 1-3.
  - III. A standardised template for the Trust forms part of this Policy to assist anyone in the activity of risk assessment (See Appendix 2).
  - IV. On the basis that a risk assessment is carried out and significant findings are recorded and effectively communicated, the activity can proceed. However, local controls may dictate that a second level of agreement is required for the activity to proceed. This may be given by, for example, the Trust's Health and Safety Manager, an Activities Manager or a Senior Management Team (SMT) member. It will be the Bede's process that:
    - a) In the case of off-site visits, agreement to proceed will be sought from the Health and Safety Manager or in their absence, a member of SMT.
    - b) In the case of Summer School activities, agreement to proceed will be sought from the Activities Manager.
  - V. To be able to provide effective consideration and contribution to the assessment process, and for the organiser to take any remedial action necessary, the Health and Safety Manager should ideally receive any (off-site visit) risk assessment for review at least 4 full working days in advance.
  - VI. The process for risk assessment is summarised and set out as a Control Process Map in Appendix 1.

## **9. Risk Evaluation**

- I. The assessment of risk requires judgement. The assessment of the degree of risk (that could arise from the hazard) based upon the likelihood of the event occurring and the potential severity of the consequence.
- II. Judgement (risk evaluation) is subjective and an author must be aware that the degree of risk may appear naturally lower to them, because of their familiarity with or capability to perform a task compared to another author, and take account of this when making an evaluation.
- III. The author must equally consider the familiarity and capability of participants, so factors like their experience, fitness and age. The assessment must consider the effect of risk on all potential groups of people that could be affected, or for those identified as especially at risk, a risk assessment should be completed for a particular group of people or person e.g. a new or expectant mother.
- IV. An activity should proceed with caution and be subject to monitoring if residual risk is rated as tolerable i.e. 'medium'. An activity should not proceed if after all reasonably practical control measures have been applied, residual risk is rated as unacceptable i.e. 'medium-high' or 'high'.

- V. Bede's will evaluate risk numerically using a 1-5 scale. Degree of risk will be arrived at by multiplying the estimated likely severity of harm by the estimated likelihood of harm. The table below will provide guidance in evaluating the significance of a numeric total (degree of risk).

LIKELY SEVERITY (S): Major (5) / Substantial (4) / Moderate (3) / Low (2) / Minimal (1)									
LIKELIHOOD OF HARM (L): Frequent (5) / Probable (4) / Occasional (3) / Unlikely (2) / Rare (1)									
DEGREE OF RISK (DR) = 1 – 25: Use Risk Rating Matrix below to evaluate risk									
	S1	S2	S3	S4	S5	Risk Score	Degree of Risk	Risk Evaluation	Residual Risk Action
L1	1	2	3	4	5	(1-2)	Low (L)	Minimal	Proceed
L2	2	4	6	8	10	(3-5)	Low – Medium (LM)	Acceptable	Proceed and monitor
L3	3	6	9	12	15	(6-14)	Medium (M)	Tolerable	Proceed with caution and monitor
L4	4	8	12	16	20	(15 - 19)	Medium – High (MH)	Unacceptable	Insufficient Control Measures – DO NOT proceed
L5	5	10	15	20	25	(20 – 25)	High (H)	Unacceptable	Insufficient Control Measures – DO NOT proceed

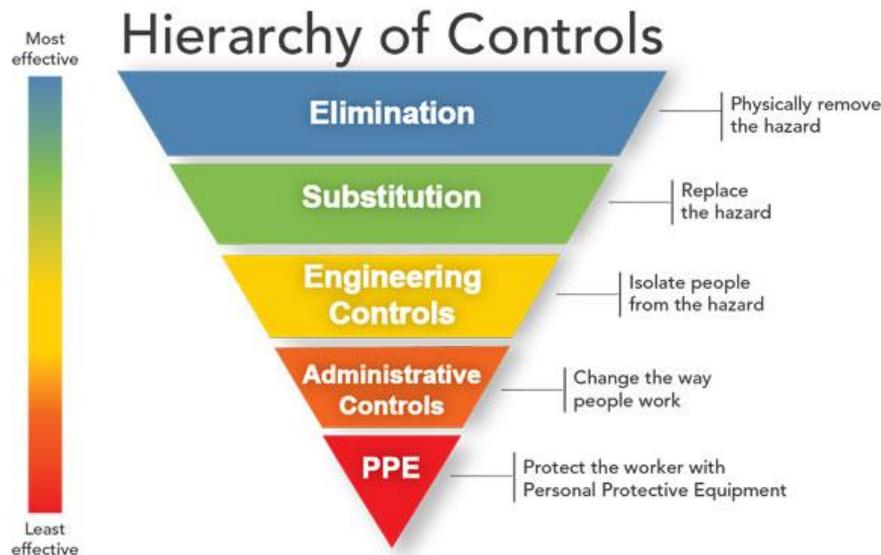
## 10. Risk Control Measures

- I. The law requires:

*It shall be the duty of every employer to ensure, so far as is reasonably practicable the health, safety and welfare at work of both employees and non-employees affected by the employers undertaking (e.g. contractors, members of the public, pupils etc).*

- II. The aim of control measures is to lower the risk of the identified hazard to as low as is reasonably practical, so that the risk is considered minimal or acceptable i.e. 'low' or 'low-medium', or at least tolerable i.e. 'medium'.
- III. The term 'so far as is reasonably practicable' is important as it defines the limits of the risk assessment process, specifically the control measures to be applied. In so far as is reasonably practicable (SFARP) means:
- Having to exercise judgement.
  - Weighing risk against the 'trouble' to address it, in terms of time, cost, resources, aesthetics, sustainability etc (reasonability) and what is possible to achieve based on current knowledge, innovations and technologies (practicable).
  - Where the law is not specific, deferring to existing industry standards, such as Best Available Techniques (BAT) and Technically Environmentally and Economically Practicable (TEEP) solutions. Or on a less industrial level, HSE Legal Reference Notes, and Guidance, or trade industry guidance, or professional organisation guidance.
  - Not implementing a potential control measure if the cost etc is grossly disproportionate the risk of harm.
- IV. When formulating control measures, measures should be decided on in accordance with a control hierarchy, which directs that some types of control measures are better than others, and

the more effective control measures should be employed over less effective control measures. Risks will be reduced to the lowest reasonably practicable level in accordance with this order of priority.



## 11. Monitoring and Review

- I. Managers or other appropriate persons shall monitor the effectiveness of control measures and ensure that physical control measures are used, installed correctly and suitably maintained where applicable. Likewise checks should be made to ensure that agreed control measures and safe systems of work are being followed correctly.
- II. The law requires:
 

*Any assessment shall be reviewed by the person that made it if there is reason to suspect that it is no longer valid or there has been a significant change in the matter to which it relates.*
- III. It is appropriate to review a risk assessment:
  - a) So that it remains relevant to the current activities of the organisation.
  - b) So that it remains relevant to the way in which the activity is currently carried out.
  - c) Following a significant incident, indicating that the risk assessment may not have suitably and sufficiently captured or evaluated all risk.
- IV. A formal risk assessment review schedule should be based on the degree of overall activity risk. For example, a generally high risk task (after control measures are applied) should be subject to frequent review, such as daily, weekly or monthly. It is common practice for a generally low to medium risk activity to be subject to annual review and for a very low risk or static activity to be subject to biannual or triannual review. For unique activities, such as off-site visits and events it is good practice to review the risk assessment for each incidence. Where guidance does not set a schedule, such as annual review of Fire risk and biannual review of Legionella risk, Bede's will adopt these practices.
- V. A risk assessment 'author' or 'owner' is responsible for ensuring it is subject to suitable review.
- VI. The Health and Safety Committee are responsible for reviewing key health and safety risks and for maintaining a register of significant risks/issues and actions (with deadlines).

- VII. The Risk Review Audit Committee are responsible for monitoring, reviewing and reassuring the Board that risks at a Trust level, as recorded in the corporate risk register, are being adequately managed by the Executive.

## 12. Communication

- I. The significant findings of a risk assessment will be recorded and conveyed to those that could be affected by the identified hazards e.g. pupils in or care. This would include the risk of exposure and the control measures that must be employed to reduce risk. Documented risk assessments will be readily accessible to employees and others as appropriate.
- II. A risk assessment 'author' or 'owner' is responsible for effectively communicating the significant findings to those potentially exposed to the identified hazards.
- III. Heads of Departments / departmental managers are responsible for making suitable representation to the relevant SMT or Health & Safety or SMT Committee if risk assessments identify a necessary control measure that cannot be met by the available departmental resources.
- IV. It is however everyone's duty of care in the workplace to highlight and report foreseeable risk, so that action can be taken to address it and prevent harm. This duty is not restricted to the risk assessment process.

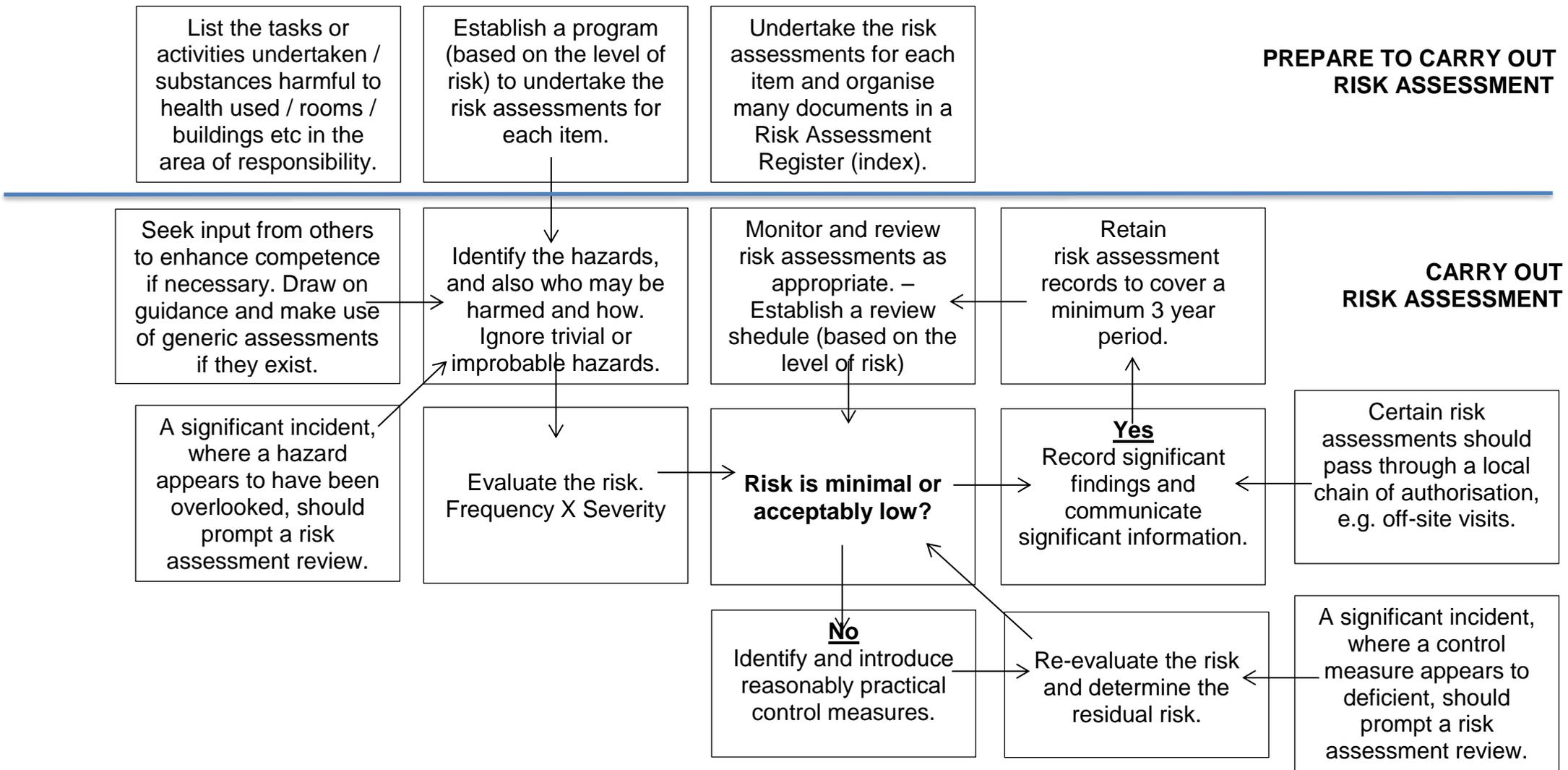
## 13. Record Keeping

- I. Where someone is responsible for the management of a large number of risk assessment records, they should compile a register, to keep track of the document records and for easy reference purposes. A register can also be used to track review dates.
- II. A risk assessment 'author' or 'owner' is responsible for ensuring it is subject to suitable retention.
- III. Risk assessment records will be kept to cover a minimum 3 year period, as they may be required to prove that a risk assessment was historically in place.
- IV. Risk assessments for a workplace task involving exposure to substances harmful to health and where an employee is subject to health surveillance should be kept (along with health surveillance records) for 40 years, in order to trace exposure to substances which are known to have latent ill health effects e.g. asbestos.

<b>Owned by:</b>	Health & Safety Manager
<b>Authorised by:</b>	Governing Body
<b>Policy Issued:</b>	September 2018
<b>Policy Review:</b>	September 2020
<b>Circulation:</b>	All Staff

Date	Review Comments	Reviewed By
02.10.2015	Transfer of Ownership of Policy from Director of Estates to Trust Health & Safety (Fire Safety) Coordinator. Appendix 3 & 4 added for staff guidance. This Policy is a requirement of the Independent School's Inspectorate (ISI 188 – 187) submitted to Bede's Governing Body for ratification.	Trust H&S Co-ordinator
15.09.2016	Policy reviewed – No changes necessary.	Trust H&S Co-ordinator
16.11.2016	Additional bullet points and reference to areas of potential risk included to Introduction and Statement of Intent with due regards to ISI Part 3 Paragraph 16 (207) – Risk Assessment.	Trust H&S Co-ordinator
12.10.2017	Minor changes to 1. Responsibilities	Trust H&S Co-ordinator
17.08.2018	Full review and restructure of Policy content. Appendix 3 and 4 removed. Biannual review introduced.	Trust H&S Co-ordinator
12/10/2018	<ul style="list-style-type: none"> <li>• Review of risk assessment template</li> <li>• References proposal accepted by Health and Safety Committee for a Health and Safety Risk Register to be established in order to track health and safety risks</li> </ul>	Trust H&S Manager
30.10.18	<ul style="list-style-type: none"> <li>• Exec requested change reference from 'students' to 'pupils' (as per ISSR)</li> </ul>	Bursar

## Risk Assessment Process Map





Appendix 2

**RISK ASSESSMENT Title**

Date(s):		Timings:	
Activity location:		Responsible person:	
Activity detail:			
Number of supervisory adults:		Number of pupils:	
		Supervision ratio:	
<ul style="list-style-type: none"> <li>All supervisory adults must have been assessed by HR as suitable to work with children, relative to their respective roles (teacher, volunteer etc)</li> <li>Supervision ratio to comply with the ratios set out in the Bede's Educational Visits Policy</li> </ul>			
Who is at risk of harm?			
<ul style="list-style-type: none"> <li>SUPERVISORY ADULTS must make a personal assessment as to their own health condition and suitability to take part</li> </ul>			

SEVERITY		LIKELIHOOD		RISK EVALUATION Severity x Likelihood = Risk (R)	RESIDUAL DEGREE OF RISK S x L=R		
Major	5	Frequent	5				
Substantial	4	Probable	4				
Moderate	3	Occasional	3				
Low	2	Unlikely	2				
Minimal	1	Rare	1				
HAZARD	WHO WILL BE HARMED (and how)	RISK CONTROL MEASURES (What you will do to stop or reduce the harm)			RISK		
					S	L	R

		•			
		•			
		•			
		•			
		•			
		•			
<b>Responsible person / author</b>		<b>Health and Safety Manager</b>		<b>Date:</b>	
<p><b>The responsible person must now share the significant findings of the risk assessment with all persons that need to know, i.e. all supervisory adults and pupils.</b></p> <ul style="list-style-type: none"> <li>➤ Circulate this risk assessment by email to all supervisory adults prior to activity</li> <li>➤ Group Leader to advise pupils verbally of the hazards and control measures they should take prior to activity by way of a briefing</li> </ul>					