

<b>Activity</b>	<b>Wider College Re-opening - September 2020</b>	<b>Date of Assessment</b>	<b>11<sup>th</sup> August 2020</b>	<b>Date of Last Review:</b>	<b>27<sup>th</sup> August 2020</b>
<b>Purpose of Risk Assessment</b>	<b>To take all appropriate steps to minimise the risks associated with exposing staff and students to COVID-19 when attending College by reducing the risk of infection spread and to take all appropriate steps in the event of a suspected or confirmed case within the College community.</b>				

<b>Assessment completed by:</b>			
<b>Name:</b>	Shaun Godfrey, Estates Manager & Ruth Pender, Director of HR	<b>Signature:</b>	Ruth Pender Shaun Godfrey

What has the potential to cause harm? (Hazards)	What are the Hazards to Health and Safety	Who might be harmed and how?	Control Measures (preventative and protection measures)	Risk Level			What further action, if any, needs to be taken to reduce risk sufficiently	Residual Risk Level			Action by Who, When
				I	P	R		I	P	R	
<b><u>Entry &amp; Exit to College</u></b> by Staff, students & visitors	Close contact with others increases risk of transmission	Risk to staff, students & visitors of exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-</li> </ul>	<b>Elimination</b> <ul style="list-style-type: none"> <li>Only essential visitors authorised in advance by Principal can attend College. Visitor log to be maintained by SLT Admin Officer to assist with track and trace;</li> <li>All parents and carers advised that they should not attend the College reception or entrance unless agreed in advance with the Principal or Director of Student Support Services;</li> <li>Meetings with parents during college day to be held remotely using Microsoft teams where possible.</li> </ul> <b>Control;</b> <ul style="list-style-type: none"> <li>All staff, students and visitors to wear face coverings in communal college areas (corridors,</li> </ul>	5	3	15	Operating procedure for staff to include requirements re visitors  Communication with parents & carers re requirement for pre-booked appointments only & use of Microsoft teams where possible	5	2	10	Revised Operating Procedures - Director of HR & Estates to be issued by 3 <sup>rd</sup> September 2020  Director of Student Services by 3 <sup>rd</sup> Sept 2020

		distancing	<p>foot outlets and reception area) – to be worn on entering college premises.</p> <p>NB. Face coverings optional for staff working on reception as Perspex screen in place</p> <ul style="list-style-type: none"> <li>• Main-entrance split to allow 1 way-entrance and 1-way exit;</li> <li>• Signage outside main entrance to communicate &amp; illustrate 2 metre-rule on entry (ground markings &amp; wall signs);</li> <li>• SLT or Estates presence outside main entrance to ensure adherence to 2 metre-rule on-entry;</li> <li>• Inner entrance doors to be kept open to reduce points of hand contact;</li> <li>• Bridge doors to be open at end of day to allow students to access college bus stops– staff presence required in bus areas at end of day to monitor congestion</li> <li>• Hand-sanitiser station on entry and exit; plus by bridge door</li> <li>• Staff to be advised of revised arrangements for September wider re-opening (revised operating procedures)</li> <li>• College rules on infection control and social distancing measures to be communicated to students in advance of attending college</li> <li>• PPE (face-shield &amp; mask) to be provided to gate security officer.</li> <li>• Clear signage on entry advising that no one should enter college buildings if they have any Covid19 symptoms;</li> </ul>				<p>SLT or Estates presence outside main entrance every morning to ensure adherence to control measures;</p> <p>Staff presence in bus bay area at the end of each day.</p> <p>Regular reminders to staff and students regarding social distancing measures &amp; hygiene measures – by email and instruction by staff.</p>				<p>Rota for SLT Duty Officers and to be compiled - SLT Administrator by 3<sup>rd</sup> Sept 2020.</p> <p>Staff rota for overseeing bus bay area to be compiled - SLT Administrator by 3<sup>rd</sup> September 2020</p> <p>Director of HR/ Director of Student Services - Ongoing</p>
<p><b>Reception Area</b></p> <p>Close physical</p>	Close contact with others increases risk of transmission	Risk to staff, students & visitors of exposure to virus via:	<ul style="list-style-type: none"> <li>• Perspex screens have been installed at student services reception desk;</li> <li>• Face coverings to be used by all staff and students visiting the reception area</li> </ul>	5	2	10	Reception staff to notify SLT or any students not adhering to	5	2	10	Reception Staff – Ongoing

contact - staff, students, visitors		<ul style="list-style-type: none"><li>inadequate social-distancing</li><li>physical inhalation of airborne virus.</li><li>inadequate personal hygiene,</li><li>physical contact with contaminated surfaces</li></ul>	<ul style="list-style-type: none"><li>Face coverings for reception staff optional when behind Perspex screen;</li><li>As above – only essential visitors to attend college with Principal / Director of Student Services consent.</li><li>Floor markings and signage surrounding reception area to communicate 2metre distance rule;</li><li>Student services reception staff to be provided with College mobile and students on site to be advised to telephone or text college mobile rather than contact reception in person.</li><li>SLT Duty Officers to patrol reception area to ensure that the area does not become congested; Face masks, visors &amp; gloves to be provided to reception staff for use where necessary.</li></ul>	5			social distancing rules.  SLT Duty Officer to monitor congestion as part of regular patrols.				SLT Duty Officer rota - SLT Administrator by 3 <sup>rd</sup> September
<b><u>Deliveries &amp; Post</u></b>	Close contact with others increases risk of transmission  Physical contact with contaminated surfaces	Risk to staff (in particular reception staff & estates) students & visitors of exposure to virus via: <ul style="list-style-type: none"><li>physical contact with contaminated surfaces,</li><li>inhalation of airborne virus,</li><li>inadequate personal hygiene,</li></ul>	<ul style="list-style-type: none"><li>Reduce frequency of supplies by bulk ordering and eliminate non-essential orders;</li><li>No delivery of personal items to College premises;</li><li>Clear demarcation of delivery points to save unnecessary physical interactions – including “non-touch” drop points to avoid unnecessary interaction between delivery person and staff;</li><li>Staff handling post to use gloves due to virus possibly being present on paper, cupboard and plastic and other packaging;</li><li>All staff advised to safely and quickly dispose of external packaging and immediately wash hands after handling incoming items;</li><li>Staff to collect deliveries as soon as possible to avoid build-up of packaging and multiple handling of items by staff.</li></ul>	5	2	10	Further meeting to be held with reception staff and estates team members at the beginning of the academic year to discuss arrangements for reopening to students on 3 <sup>rd</sup> Sept  Staff to be advised of arrangements for post and deliveries - include in revised	5	2	10	Estates Manager & Director of HR by 3 <sup>rd</sup> September 20  Director of HR by 3/9/20 (included in revised operating procedures for staff)

		<ul style="list-style-type: none"> <li>inadequate social-distancing</li> </ul>					operating procedures				Estates Manager by 1/9/20
							Clear signage & instruction for delivery drivers				
<b><u>Staff attendance on College premises</u></b>	<p>Close contact with others increases risk of transmission</p> <p>Key staff not available on site due to illness etc.</p>	<p>Risk to staff, students &amp; visitors of exposure to virus via:</p> <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	<ul style="list-style-type: none"> <li>Staff to attend College for 'Start of Year – Health and Safety Meetings on 1<sup>st</sup> September (small groups 10-15 staff in well ventilated room with 2-metre spacing)</li> <li>All risk assessments with highest risk groups (Red) to be completed by 2<sup>nd</sup> September 2020 and necessary control measures put in place.</li> <li>All risk assessments with medium risk groups (Amber) to be completed by 4<sup>th</sup> September 2020.</li> <li>Priority for partial home-working will be given to staff in the Red and Amber categories.</li> <li>Staff who are required to self-isolate will carry out their duties remotely (unless illness prevents this). Staff are required to attend refresher training for Teams/ remote IT systems to support remote working where required;</li> <li>Teachers are encouraged to work from home at times when they are not timetabled to teach but must be available to support students/attend meetings with their manager remotely during this time where necessary.</li> <li>Other staff may be permitted to work from home on a rota basis to undertake specific tasks</li> </ul>	5	3	15	<p>Induction for staff on H&amp;S Arrangements &amp; address staff concerns</p> <p>Risk Assessments for Staff in Red Category to be completed by 2/9/20</p> <p>Risk Assessments for Staff in Amber Category to be completed by 4/9/20</p> <p>Staff to attend refresher training to ensure effective remote working.</p> <p>A record of staff working from home on a particular day to be maintained by Line Managers &amp;</p>	5	2	10	<p>Director HR &amp; Principal by 1/9/20</p> <p>Director of HR &amp; Estates Manager – by 2/9/20</p> <p>Director of HR &amp; Estates Manager by 4<sup>th</sup> Sept 2020</p> <p>Staff by 4<sup>th</sup> September 2020</p> <p>Line Managers - ongoing</p>

			<p>– priority will be given to staff in Red Risk category;</p> <ul style="list-style-type: none"> <li>• Due to the likelihood of staff being required to self-isolate if they develop symptoms the number of cover teachers will be expanded to ensure classes can be supervised. Cover from consistent group of cover team staff or long-term agency will be sought rather than intermittent staffing.</li> <li>• Ensure appropriate records are kept of staff who are required to self-isolate along with follow-up discussions about testing and test results (see below re dealing with suspected case)</li> <li>• Staff should work between their workroom and classroom whilst on site and are encouraged to take breaks outside where weather permits (see sections on workrooms &amp; staff social areas below)workroom or office and contact colleagues by phone rather than visit other areas in person (see below)</li> <li>• A list of essential college workers to be compiled and shared with trade unions – this will include a Designated Safeguarding Officer, qualified H&amp;S Estates Team Member, First Aiders, Fire Marshals and a minimum of two SLT Duty Officers. An emergency meeting should be held should staff absence levels rise and contingency plans in place.</li> </ul>			<p>provided to HR.</p> <p>Expand pool of cover team staff</p> <p>Induct new and existing cover team members into H&amp;S arrangements and induct full cover team</p> <p>Essential Worker Staff List to be provided to trade unions</p>			<p>Director of HR by 2/9/20</p>
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<u>Use of Workrooms &amp; Office Space</u>	Overcrowding and mixing of staff	Risk to staff, students & visitors of exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	<u>Workrooms – teaching staff</u> <ul style="list-style-type: none"> <li>The maximum occupancy in each work room for teaching staff has been identified based on a 2-metre. Appropriate signage is in place on workroom doors;</li> <li>Staff should not exceed the maximum occupancy at any one time and maintain a 2-metre distance at all times;</li> <li>Staff will work between their workroom and classroom as their base for the day;</li> <li>When timetables are confirmed and ‘free’ periods identified, staff are asked to liaise with colleagues regarding their base during the working day;</li> <li>Teachers who have a free period at the start or end of the day are encouraged to work from home during this time but should be available for work in case timetables change or face to face meetings required;</li> <li>Students are not permitted to visit staff in their workrooms. 1-2-1 meetings with students should take place in vacant classrooms where a 2-metre distance can be maintained. Break-out social spaces for students will be re-designated for 1-to-1 meetings with students.</li> </ul>	3	5	15	Provide clear guidance for staff as part of the Start of Year Health & Safety meetings and address staff concerns	2	5	10	Principal & Director of Hr by 1/9/20
	Close contact with others increases risk of transmission  Physical contact with contaminated surfaces						Staff to liaise with team members to agree ‘rota’ for use of workroom when timetables confirmed & frees identified  Clear instructions to students about not visiting staff in workrooms - pre-arranged meetings in vacant classrooms only				Staff teams by 2/9/20  Director of Student Services - by 3/9/20 for year 13s and w/c 7/9/20 for year 12s



	transmission  Physical contact with contaminated surfaces	<ul style="list-style-type: none"> <li>surfaces, inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	with students <ul style="list-style-type: none"> <li>Canteen and shop open for staff and students (see details below)</li> <li>Staff can use the outside balconies provided they sit at a safe distance. Staff are encouraged to take breaks in other outside areas where weather permits;</li> <li>Staff are encouraged to avoid use of shared microwaves and fridge where possible. Facilities must be cleaned after each use.               <ul style="list-style-type: none"> <li>Small groups of staff can meet and each lunch in a vacant classrooms in their area provided a 2 metre distance is maintained (average occupancy in classrooms for 2 metre distance is 8 members of staff).</li> </ul> </li> </ul>				Staff to receive regular reminders of hygiene measures in kitchen & staffroom				
<b><u>Staff Meetings</u></b>	Close contact with others increases risk of transmission	Risk to staff, students & visitors of exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	<ul style="list-style-type: none"> <li>All staff meetings will only take place remotely on Teams;</li> <li>Essential meetings may take place with small groups of staff (max 10 – 15 staff members) where larger spaces such as the refectory / large sports hall are vacant to provide 2 metre social-distancing;</li> <li>Only essential participants should attend;</li> <li>Meetings should be kept as short as possible;</li> <li>Social distancing should be maintained throughout;</li> <li>Avoid use of shared objects and shared refreshments;</li> <li>Meetings should take place in a well-ventilated room;</li> <li>Staff can meet with team colleagues on an informal basis in vacant classrooms provided a 2 metre social distance maintained (average occupancy in classroom based on a 2 metre distance is 8);</li> </ul>	5	2	10	<ul style="list-style-type: none"> <li>Staff to be advised of protocol for meetings</li> </ul>	5	2	10	Share details at Start of Year Health & Safety Meetings - Director of HR on 1/9/20



<p><b><u>Student attendance on College premises</u></b></p>	<p>Close contact with others increases risk of transmission</p>	<p>Risk to staff, students &amp; visitors of exposure to virus via:</p> <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	<ul style="list-style-type: none"> <li>Students (copy to parents/carers) will be sent 'Joining Instructions' outlining the health and safety measures in place.</li> <li>A staggered start is in place for students from 3<sup>rd</sup> September <ul style="list-style-type: none"> <li>Part 1 - Student induction days will be held for the first 4 days of term with approximately 500 students on site each day in half size classes. Students will be inducted into the new H&amp;S measures in place. We will review and, if necessary, make changes before moving to approx. 950 students on site for 2 week blended-learning model.</li> <li>Part 2 – Blended timetable</li> <li>Blended model of teaching from Thursday 10<sup>th</sup> to Thursday 24<sup>th</sup> September comprising 1 face to face lesson per week (starting Thursday 10<sup>th</sup>) and remote work for the other 2 lessons plus homework.</li> <li>Part 3 – Review with aim to increase to fulltime on site from 24<sup>th</sup> September subject to local conditions.</li> </ul> </li> <li>Regular review of arrangements with trade unions including review of local transmission rates.</li> <li>Arrangements in place to respond to the requirement to teach remotely on a full time basis or extend blended model if required</li> </ul>	<p>5</p>	<p>3</p>	<p>15</p>	<p>Joining instructions to be send to all students &amp; parents/carers before starting at college including the importance of not attending college if they develop Covid19 symptoms</p> <p>Expectations regarding behaviour and consequences of not adhering to H&amp;S measures to be reiterated during induction days.</p> <p>Regular review meetings with trade unions</p> <p>Refresher Training on IT systems to support remote delivery</p>	<p>5</p>	<p>2</p>	<p>10</p>	<p>Principal &amp; Director of Student Services by 1/9/20</p> <p>Principal &amp; Director of Student Services by 8/9/20</p> <p>Director of HR to arrange meeting schedule by 2/9/20</p> <p>Director TLA by 8/9/20</p>
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<u>Student Contacts at College</u>	Close contact with others increases risk of transmission	Risk to students and staff of exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	Minimising contacts and mixing between students: <u>Curriculum time</u> <ul style="list-style-type: none"> <li>Students will work within 3 or 4 class bubbles (depending how many courses chosen)</li> <li>Students need to sit next to the same partners each lesson (thereby limiting 'mixing' within each classes);</li> <li>Seating plans should be recorded and retained;</li> <li>Group work should be with students who sit adjacent to them in class and always be the same groups (sub-groups within classes set for the year);</li> <li>Classroom layouts have been configured so that all student desks face the front;</li> <li>2-metre space between teacher and students must be maintained.</li> </ul>	5	3	15	Arrangements in place to be shared with students before start of term and during induction days  Staff to retain up to date seating plans for each class that they teach	5	2	10	Principal & Director of Student Services by 1/9/20  Ongoing - teaching staff
			Minimising contacts and mixing between students: <u>Tutor time, subject support, enrichment</u> <ul style="list-style-type: none"> <li>Remote Tutor Group Sessions for at least term 1</li> <li>Students will be assigned to a tutor group and 1-to-1 reviews between students and tutors will still take place on site</li> <li>Face-to-Face Group Subject Support Sessions limited to students from the same class 'bubble.'</li> <li>1-to-1 subject support can take place in classrooms but not in workrooms. 2-metre distance must be maintained</li> <li>Initially only remote enrichment activities will be held pending review</li> </ul>				Staff to be advised of arrangements for managing class groups and requirements for 1-to-1 meetings				Principal & Director of HR by 1/9/20 - start of year H&S induction meetings
			Minimising contacts and mixing between students: <u>Social Arrangements and Study Spaces for Students</u> <ul style="list-style-type: none"> <li>Students <b>encouraged to socialise outside</b> at a safe distance where weather permits</li> <li>Students will be assigned a social space for breaks and for free periods:</li> </ul>								

			<ul style="list-style-type: none"> <li>➤ Year 12 A – refectory &amp; study zone</li> <li>➤ Year 12 B – B.3.7 &amp; LIC</li> <li>➤ Year 13 A – Large Sports Hall (Zone A) + designated classrooms</li> <li>➤ Year 13 B – Large Sports Hall (Zone B) + designated classrooms</li> <li>• Overflow areas will be identified for each group (vacant classrooms)</li> <li>• Students badges will indicate the designated social space</li> <li>• Students can go early to the next classroom for lessons after break and lunchtime</li> <li>• Students will be permitted to eat and drink in their designated social space during lunch and break times whilst maintaining social distance</li> <li>• In designated social spaces, face coverings are recommended but not mandatory as students will be eating and drinking.</li> <li>• Staff assigned to monitor social spaces to ensure adherence to rules.</li> </ul>				<p>Identify vacant classrooms when timetabling completed</p> <p>Assign staff to oversee designated social spaces</p>				<p>Information Services Manager by 2/9/20</p> <p>Director of HR by 3/9/20</p>
<b>Provision of communal catering facilities</b>	Close contact with others & poor hygiene practices increase risk of transmission	Risk to staff and students - Transmission of virus through: <ul style="list-style-type: none"> <li>• physical contact with contaminated surfaces</li> <li>• inhalation of airborne virus</li> </ul> inadequate physical distancing inadequate personal hygiene standards	<ul style="list-style-type: none"> <li>• Risk Assessment undertaken by sub-contracted Catering Provider based on government guidance for food businesses. Estates manager to monitor adherence to control measures</li> <li>• The canteen and shop will be open for staff and students;</li> <li>• Face coverings to be worn in all food outlets (except students eating in zoned area at rear of refectory)</li> <li>• Hand-sanitiser stations in place at food outlets and signage to remind of importance of hand washing</li> <li>• Only 'Grab and Go' options (hot and cold food) will be available to avoid queues and handling of food;</li> </ul>	3	5	15	<p>Regular audit of arrangements in kitchen &amp; address concerns with Catering Manager</p> <p>SLT Duty Officer, Student Supervisor &amp; Estates Team to oversee canteen areas and shops to ensure that congestion avoided and</p>	2	5	10	<p>Estates Manager – ongoing</p> <p>SLT Duty Officer Rota too be compiled - SLT administrator by 2/9/20</p>

			<ul style="list-style-type: none"> <li>Seating in the refectory has been reduced to allow airport-style queuing. Remaining seating is for use only by students in Year 12 A group;</li> <li>Seating will not be available in the shop and socially distanced queue in place;</li> <li>Seating unavailable in break-out areas (with the exception of a few 1-1 booths)</li> <li>Trolley service available for refreshments in B3.7 if necessary</li> <li>Drinking fountains will not be in operation – students encouraged to bring their own water or purchase from outlets;</li> <li>Vending machine available (subject to suppliers) - hand sanitiser station to be installed next to machines and signage regarding students washing hands near vending machines;</li> <li>Where weather permits students advised to take breaks outside.</li> </ul>				social distance maintained in queues				
<b>Sports Hall Usage</b>	Close contact with others & poor hygiene practices increase risk of transmission	Risk to staff, students & visitors of exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	<ul style="list-style-type: none"> <li>Facilities not currently being used by Nuffield Health after College hours so no usage by members of the public;</li> <li>No team games or fixtures currently planned;</li> <li>When sports resumed identify how the risks associated with ‘travelling’ coaches who visit a number of schools can be managed;</li> <li>Social seating removed and reception are designated into space for 1-to-1 meetings for staff and students;</li> <li>Signage and instructions to students that social space can’t be used.</li> <li>Classrooms to remain unlocked for students to access on arrival to avoid congestion in reception area;</li> <li>Classroom furniture reconfigured, cabinet removed and Perspex screen installed at</li> </ul>	5	3	15	Undertake a risk assessment with Nuffield Health if reopening facilities after hours to public planned before end of term;  When team games / fixtures are resumed undertake a risk assessment with sports staff & review use of casual staff who	5	2	10	Director of HR & Estates Manager - where required  Director of HR & Estates Manager & Sports Staff - when required

			<p>teachers desks;</p> <ul style="list-style-type: none"><li>• Workroom arrangements (as above for all workrooms)</li><li>• Only BTEC sport students with classes can access reception area to enter classrooms</li><li>• Hand sanitiser stations at various locations in sports hall – on entry, outside classroom, in sports hall etc</li><li>• Communal corridor and toilets (as above) – signs and floor</li><li>• A level and BTEC sport will rearrange practical units to avoid them being undertaken in Autumn Term – review risk assessment when practical activities resumed in line with any relevant government guidance re sports activities;</li><li>• Large Sports Hall designated as a year 13 study space (see above). Access to be gained via side entrance (not via reception) and dedicated staff presence to oversee arrangements</li></ul>				<p>work across different colleges</p> <p>Review risk assessment before practical units are delivered to identify appropriate control measures.</p> <p>Signage to advise that only BTEC students attending lessons can access reception area</p> <p>Staff Toilet to be installed adjacent to staff shower room</p>				<p>Director of HR &amp; Estates Manager &amp; PE/ BTEC Sports Staff - when required</p> <p>Estates Manager by 3/9/20</p> <p>Estates Manager asap</p>
<b>Travel to College</b>	<p>Close contact with others &amp; poor hygiene practices increase risk of transmission</p> <p>Congestion at bus queues</p>	<p>Risk to staff, students &amp; visitors of exposure to virus via:</p> <ul style="list-style-type: none"><li>• physical contact with contaminated surfaces,</li><li>• inhalation of airborne virus,</li></ul>	<ul style="list-style-type: none"><li>• Refer to the SKILLS GROUP RISK ASSESSMENT for students travelling on college buses.</li><li>• The control measures in the risk assessment completed by Skills to be shared with students and relevant staff.</li><li>• Students will be required to wear face coverings at all times when waiting for buses and whilst on college buses</li><li>• Students will be asked to hand sanitise as they get on and off the bus (gel provided by Skills)</li><li>• Students should fill up buses from the top and</li></ul>	5	3	15	<p>Advice on safe travel to college provided to staff and students</p>	5	2	10	<p>To students - Principal &amp; Director of Student Services by 2/9/20</p> <p>To staff – Principal &amp; Diirector of HR by 1/9/20</p>

		<ul style="list-style-type: none"> <li>inadequate personal hygiene,</li> <li>inadequate social-distancing</li> </ul>	<ul style="list-style-type: none"> <li>the back to minimise mixing (drivers will advise)</li> <li>Students should sit next to the same people each day on the bus to limit contacts.</li> <li>Windows open for better ventilation the buses.</li> <li>Appropriate disinfection of buses by skills</li> <li>Bus queues to be managed by:</li> <li>Staggered end of lessons (students catching 4.30 buses to remain in class until 4.20pm)</li> <li>Buses can enter bays when arrive early and will be unlocked to allow students to board asap;</li> <li>Duty Officers to monitor congestion in bus bay areas</li> <li>Staff and students are encouraged to walk or cycle to work where possible. Additional bike sheds will be provided where demand increases;</li> <li>Where staff have to car share this should be treated as 'public transport' – face coverings should be worn and windows open where possible</li> </ul>				Liaise with bus providers regarding H&S measures and review arrangements				Director of Student Services - ongoing
<b>Use of Classrooms</b>	Close contact with others increases risk of transmission	Risk to staff, students & visitors of exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal</li> </ul>	<ul style="list-style-type: none"> <li>All classrooms to be unlocked by Estates team before the start of day and students allowed entry when they arrive (thereby avoiding congestion in corridors);</li> <li>Door and windows will be opened to allow ventilation prior to arrival;</li> <li>Hand-sanitiser station available outside every class and inside some classrooms for practical subjects.</li> <li>Classroom seating has been reconfigured so that all desks facing the front of the room.</li> <li>Size of cohort will initially be 50% normal class size</li> </ul>	5	3	15	Clear protocol for staff to be shared for managing social distancing arrangements in classrooms and action to be taken if a student develops/ demonstrates symptoms whilst in class.	5	2	10	Estates Manager/ Director of HR By 1/9/20

		<ul style="list-style-type: none"> <li>hygiene, inadequate social-distancing</li> </ul>	<ul style="list-style-type: none"> <li>Students need to sit next to the same partners each lesson (thereby limiting 'mixing' within each classes);</li> <li>Seating plans should be recorded and retained;</li> <li>Group work should be with students who sit adjacent to them in class and always be the same groups (sub-groups within classes set for the year);</li> <li>Teachers desks have a 2-metre space between teacher and students.</li> <li>Teachers should maintain a 2-metre distance from students in class &amp; not travel around class to check students work <i>(NB. For some practical subjects portable Perspex screens will be provided)</i></li> <li>To discuss work with students, they must come to front and remain 2 metres away (where space is available in the class) - visors and/or masks can be worn. Teachers should also minimise students moving past other student desks during class.</li> <li>Classrooms should be free from any unnecessary clutter with non-essential furniture removed;</li> <li>Windows should remain open during lessons and room ventilated after students leave</li> <li>Cleaning materials and data sheets provided in every classroom for use by staff as and when required.</li> <li>Students reminded of the catch-it, bin-it requirements and disposable tissues available in each classroom;</li> <li>Bin to be emptied on a regular basis throughout the day;</li> <li>Students to use own personal equipment (textbook, pens etc) where possible and not</li> </ul>			Regular checks on cleaning supplies, bins etc during the working day			Cleaning Staff - daily
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			<ul style="list-style-type: none"> <li>share personal items;</li> <li>Sharing of college equipment should be minimised as far as possible and sharing contained within class sub-groups where possible;</li> <li>Students have been encouraged to bring their own electronic devices to limit use of shared college laptops</li> <li>Staff to limit the amount of handouts and use electronic documents wherever possible.</li> <li>Regular hand sanitisation reminders should be given to students;</li> <li>All extraneous equipment and materials locked away to prevent unnecessary handling</li> <li>Cleaning staff will ensure that high-risk objects such as door handles, pcs etc are regularly cleaned in accordance with Covid cleaning schedule</li> <li>Arrangements for cleaning and disinfecting subject specific equipment to be agreed and shared with College H&amp;S Manager</li> <li>Students should work in consistent groups for practical work &amp; use outside space as a breakout area during class where weather permits</li> </ul>								
<b>Managing movement around college</b>	Overcrowding and mixing of students	Staff, students & visitors - Transmission of virus through: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces</li> <li>inhalation of airborne virus</li> </ul>	<ul style="list-style-type: none"> <li>Staggered start and end of lesson times are in place for year 12 and year 13 students to reduce congestion in corridors and food outlets;</li> <li>Signage applied to floors and walls regarding social distancing and the need to wear face coverings in communal areas;</li> <li>Classrooms to remain unlocked and students advised to enter classroom when they arrive for their lesson</li> <li>All movement along corridors and stairs is kept</li> </ul>	5	3	15	SLT Duty Officer, Estates Staff, Student Supervisor to monitor movement around college –  SLT & Estates Manager to	5	2	10	SLT Duty Officer & Estates Mgr Ongoing and daily  SLT & Estates - ongoing



		<ul style="list-style-type: none"> <li>inadequate physical distancing</li> <li>inadequate personal hygiene standards</li> </ul>	<p>to the left-hand side with floor-markings and arrows.</p> <ul style="list-style-type: none"> <li>One-way systems in place on stairways to avoid congestion, clearly indicated by appropriate signage</li> <li>Barriers and queue markings are installed inside and outside buildings as appropriate to control the 'traffic' flow.</li> <li>Signage and floor markings aid physical distancing in all indoor areas and outdoor areas where there are pinch points including entrances and exits.</li> <li>Maglocks installed on doors where practicable to enable them to be kept open, reducing need for contact with doors / door handles;</li> <li>Benches to be removed from corridors and breakout social spaces dedicated for teacher-student 1-to-1 meetings;</li> <li>Student Supervisor on rota and provided with PPE along with SLT Duty Officer patrols</li> </ul>				<p>review and make adjustments to layout if necessary</p> <p>Staff to assist in monitoring traffic flows and feedback to SLT &amp; Estates Manager if concerns identified.</p>				All staff in College - on going
<b>Cleaning and disinfection</b>	Exposure to virus is increased unless appropriate standards of cleaning & disinfection are in operation	<p>Risk to staff, students, visitors of exposure to virus via:</p> <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces,</li> <li>inhalation of airborne virus,</li> <li>inadequate personal hygiene,</li> </ul>	<ul style="list-style-type: none"> <li>Additional Cleaners employed to work during the day (in addition to full evening cleaning team)</li> <li>Revised Covid-19 Schedule has been produced in accordance with national guidance and industry experts;</li> <li>Information posted in key areas, regularly refreshed on laminated washable posters</li> <li>Schedule shared with cleaning staff and data sheets to support new requirements will be in place;</li> <li>Schedule includes 'deep clean' arrangements for any area occupied by person with suspected case of Covid19;</li> </ul>	5	3	15	<p>Covid-19 Cleaning Schedule to be reviewed on a regular basis and updated in accordance with govt guidance</p> <p>Monitoring and audit of cleaning standards by Cleaning</p>	5	2	10	<p>Cleaning Mgr and Estates Mgr – weekly review</p> <p>Cleaning Mgr &amp; Estates Manager - ongoing</p>

		<ul style="list-style-type: none"> <li>inadequate distancing</li> </ul>	<ul style="list-style-type: none"> <li>New cleaning equipment purchased to allow for effective disinfection, fogging and/or steam-cleaning toilets;</li> <li>Adequate cleaning supplies including provision of hand-gel, class-room cleaning supplies &amp; tissues in each classroom;</li> <li>Frequently emptied bins in designated classrooms;</li> <li>Full PPE available for cleaning staff.</li> <li>New Cleaners to be briefed and receive appropriate instruction regarding Covid19 cleaning arrangements</li> </ul>				Manager & H&S Officer				All staff & students - ongoing
<b>Use of lifts</b>	Overcrowding and mixing of students Exposure by touching contaminated surfaces	Risk to staff and students - Transmission of virus through: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces</li> <li>inhalation of airborne virus</li> <li>inadequate physical distancing</li> <li>inadequate personal hygiene standards</li> </ul>	<ul style="list-style-type: none"> <li>Lifts used by one person at a time unless user requires assistance by 1 other person (lifts already restricted to lift pass holders)</li> <li>Users of lift to use hand sanitiser on entry &amp; exit from lift</li> <li>lift controls to be cleaned on a regular basis</li> <li>Face coverings to be worn as in all communal area</li> <li>Signage to be displayed in and outside lifts</li> </ul>	5	2	10	Lift usage to be monitored on a regular basis by SLT Duty Officer, Student Supervisor & Estates Team	5	2	10	SLT Duty Officer, Student Supervisor & Estates Team - daily
<b>Learning Resources for Students</b>	Overcrowding and mixing of students	Risk to staff and students - Transmission of	Library and Learning Resource Centre - email request for books to LIC staff – click and collect service – no browsing of books in LIC	2	5	10	Arrangements to be confirmed to staff and				Director of HR and Director of

	Exposure by touching contaminated surfaces	virus through: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces</li> <li>inhalation of airborne virus</li> <li>inadequate physical distancing</li> </ul> inadequate personal hygiene standards	- quarantine books on return Loaned Equipment – pre-arranged collection time where possible & regular cleaning Bring own electronic device to avoid shared use of laptops College laptops and network pcs to be cleaned on a daily basis – hand sanitise on entry and exit from computer rooms Text books – reduce use or issue own personal copy to students where possible Photocopiers – hand sanitisation unit adjacent to all photocopiers				students by 3/9/20				Student Services by 3/9/20
<b>Dealing with a suspected or confirmed case of COVID-19</b>	Exposure to COVID19 virus	Transmission of virus by all persons in contact with symptomatic person including first aiders	<ul style="list-style-type: none"> <li>Clear instructions given to staff and students that they should not attend site if they develop symptoms or a required to self-isolate due to contact with a suspected or confirmed case;</li> <li>Reiterate to all persons the government guidelines and SLT to review guidance regularly so any updates are implemented promptly.</li> <li>Written procedures for dealing with a suspected case were produced in June and have been updated for September reopening</li> <li>Staff to receive appropriate and regular instruction</li> <li><b>A new ISOLATION ROOM (adjacent to the delivery doors) on lower ground floor</b> has been established with the medical room to be used as an overflow where necessary;</li> <li>Emergency contact details to notify reception staff of a suspected case so a first aider can be deployed to the isolation room made available to staff and students</li> <li>Toilet facilities for the sole use of staff</li> </ul>	5	4	20	Procedure for dealing with a suspected case to be shared and staff to receive appropriate and regular instruction  Students and parents/ carers to be advised on the same procedure that will be adopted  Staff and students to identify their quickest outside route to the isolation room as	5	2	10	Director of HR to provide further briefing to staff on procedures by 1/9/20  Director of Student Services & Director of HR by 4/9/20  Director of HR advise staff by 1/9/20 Director of

			<p>member/student in self-isolation have been put in place.</p> <ul style="list-style-type: none"> <li>Isolation of symptomatic person in designated <u>Isolation Room</u></li> <li>Teacher or support staff member to alert reception to call first aid person</li> <li>Teacher to quickly lead (at safe distance) the student to the COVID Isolation Room, now on Lower Ground Floor near delivery doors (overflow is the medical room) and leave with first aider</li> <li>All staff need to know fastest external route to isolation room</li> <li>Anyone presenting with the symptoms will be sent home and to follow NHS 111 advice.</li> <li>SLT duty manager to remain in contact with persons and advise Estates Manager/ Health &amp; Safety Officer so that the area can be locked down and a thorough clean can be carried out of the areas in the event of an actual diagnosis.</li> <li>Appropriate PPE provided to staff dealing with suspected case</li> <li>Contact tracing of staff and students (seek advice from local health protection team) &amp; self-isolation of those identified</li> <li>Full cleaning and disinfection routine applied to Isolation Room including toilet</li> <li>The importance of maintaining accurate student seating and attendance records will be highlighted to staff and students.</li> <li>Emergency meeting to be called as per procedure in the event of a confirmed case and follow advice from LHPT</li> <li>SLT to monitor levels of staff and student absence carefully and follow up on all those who have had to self-isolate</li> </ul>			<p>part of the return to work /induction</p> <p>First aiders to be receive refresher briefing on new requirements.</p> <p>Staff members and students to be advised on the requirements for testing, track and trace and self-isolation</p>			<p>Student Services by 4/9/20</p> <p>Estates Manager by 4/9/20</p> <p>Health &amp; Safety Meetings o 1/9/20</p>
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			<ul style="list-style-type: none"> <li>Follow up by College to find out outcome of test</li> <li>Where positive test result identified the College will contact the Local Health Protection Team (LHPT) - they too may contact us as part of NHS Track and Trace;</li> <li>Emergency meetings (involving TU rep)</li> <li>The College will be required to send home 'close contacts' (direct close contacts and 'proximity contacts');</li> <li>We cannot disclose specifically which staff member or student (unless essential to protect others)</li> </ul> <p>LHPT will advise the College on action to take if we have 2 or more confirmed cases within 14 days (larger group sent home or full site)</p>								
<b>Provision of first aid</b>	Potential exposure to COVID-19 virus	Transmission of virus by contact with infected person	<ul style="list-style-type: none"> <li>Two nominated first aiders will be required on site each day on a rota basis;</li> <li>The HSE guidance for first aiders in non-healthcare settings should be adopted</li> <li>First aiders not in college for partial reopening to receive Covid19 briefing on return (refresher briefing for others);</li> <li>If physical contact is required to care for or supervise students then the following PPE is to be worn; disposable apron (personal care activities only), disposable gloves, facemask, visor (visor to be sanitised after use by the user, other items of PPE to be placed in sanitary bins)</li> <li>First Aiders - First aiders are obtain the COVID-19 Grab Bag held at reception. They are to put on gloves immediately;</li> <li>Thermometers available for non-contact temperature checks.</li> </ul>	5	3	15	Written guidance in place for first aiders & first aiders refresher briefing for September return	5	2	10	Estates Manager & Director of HR by 2/9/20

<b>Fire Evacuation</b>	<p>Overcrowding and mixing of students Reduction in the number of Fire Marshals</p> <p>One-way system due to social distancing may confuse staff in the event of an evacuation</p>	<p>Risk to staff and students Transmission of virus through:</p> <ul style="list-style-type: none"> <li>Inadequate distancing</li> <li>physical contact with potentially contaminated surfaces</li> </ul> <p>Risk of confusion could impact on the speed of evacuation</p>	<ul style="list-style-type: none"> <li>The normal procedure for fire evacuation will remain but will be updated to reflect fire evacuation during Covid19 pandemic;</li> <li>Fire risk assessment updated to reflect covid19 updated procedure</li> <li>The staff rota will need to ensure appropriate fire marshals are available to ensure safe evacuation</li> <li>One-way system on stairway will be overridden in the event of an evacuation and this will be communicated to staff &amp; students</li> <li>Staff &amp; students to be advised that social distancing should be maintained where reasonably practicable – however this cannot be allowed to impact on speed of evacuation</li> <li>Social Distancing 2m to be observed at Assembly Point – message to be reiterated by fire marshals;</li> <li>Personal Emergency Evacuation Plans (PEEPS) must be reviewed prior to names individuals returning to College to ensure that they remain operable by those designated as responsible</li> </ul>	5	3	15	<p>Written instructions given to staff and students as part of induction/ start of term H&amp;S instruction</p> <p>Fire marshals briefed on arrangements</p> <p>Practice fire evacuation to be undertaken for new academic year</p>	5	2	10	<p>Estates Manager &amp; Director of HR by 1<sup>st</sup> September</p> <p>As above</p> <p>Estates Manager to arrange – by 30<sup>th</sup> September 20</p>
<b>Use of Toilet facilities</b>	<p>Exposure to virus is increased unless appropriate standards of cleaning &amp; disinfection are in operation</p>	<p>Risk to staff and students Exposure to virus via:</p> <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces</li> <li>inhalation of airborne virus</li> </ul>	<ul style="list-style-type: none"> <li>All cubicles, sinks and urinals in use</li> <li>Signage advising students to wait outside in corridor until a cubicle is free – floor markings to ensure 2 metre waiting;</li> <li>Thorough cleaning and disinfection routines in place for all toilet areas throughout day including door handles</li> <li>Soap dispenser supplies maintained and checked as working at all times.</li> <li>Sanitiser gel to be used before and after</li> </ul>	5	3	15	<p>SLT Duty Officer &amp; Student Supervisor to monitor congestion outside toilet blocks</p> <p>Cleaning</p>	5	2	10	<p>SLT Duty Officer Student Supervisor - daily</p> <p>Cleaning</p>

		<ul style="list-style-type: none"> <li>inadequate physical distancing</li> <li>inadequate personal hygiene standards</li> </ul>	entering - need signage <ul style="list-style-type: none"> <li>Laminated cleanable information posters in place</li> <li>All toilet seats now installed and notices advising toilet lids to be lowered before flushing</li> </ul>				Manager & Estates Manager to audit cleaning schedules				Manager & Estates Manager - ongoing
<b>Use of Shower Facilities for Staff</b>	Exposure to virus is increased unless appropriate standards of cleaning & disinfection are in operation	Risk to staff Exposure to virus via: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces</li> <li>inhalation of airborne virus</li> <li>inadequate physical distancing</li> <li>inadequate personal hygiene standards</li> </ul>	<ul style="list-style-type: none"> <li>Maximum occupancy is 1 staff member and signage to be placed outside accordingly;</li> <li>Staff instructed not to leave any personal belongings in shower area;</li> <li>Cleaning materials available in shower room with appropriate data sheets;</li> </ul>	5	2	10	Cleanliness of shower room to be checked by day cleaners plus SLT Duty Officer	5	2	10	Cleaning Staff & SLT Duty Officer - daily
<b>Use of Smoking Areas</b>	Mixing with others increases risk of transmission between asymptomatic carriers	Transmission of virus through: <ul style="list-style-type: none"> <li>physical contact with contaminated surfaces</li> <li>inhalation of airborne virus</li> <li>inadequate physical distancing</li> <li>inadequate</li> </ul>	Layout reconfigured to ensure: <ul style="list-style-type: none"> <li>2m space between each person at all times,</li> <li>Area is naturally ventilated,</li> <li>Sharing of smoking materials is not permitted,</li> <li>One-way circulation in place into and out of the Smoking Area where feasible, to limit crossing paths</li> <li>Notices to be displayed to remind users of social distancing.</li> </ul>	5	2	10	Area to be overseen by Estates team members who is on outside patrol	5	2	10	Estates Team - daily

		personal hygiene standards									
<b>Wearing of PPE</b>	Exposure to virus is increased unless appropriate standards of personal hygiene, removal of PPE & disinfection are in operation  Potential difficulties in sourcing PPE	Transmission of virus to staff (particularly front-line) through: <ul style="list-style-type: none"><li>physical contact with contaminated surfaces and then touching masks</li><li>inhalation of airborne virus</li><li>inadequate physical distancing</li><li>inadequate personal hygiene standards</li></ul>	<ul style="list-style-type: none"><li>A number of staff have been instructed to use PPE:<ul style="list-style-type: none"><li>First Aiders when called to an incident</li><li>Student Supervisor</li><li>Cleaning Staff</li><li>Estates team for certain tasks</li></ul></li><li>Appropriate supplies will be maintained to protect relevant staff,</li><li>Persons to ensure they remove PPE safely to prevent cross contamination and all waste to be placed in waste bags</li><li>Staff and students to ensure they still follow the hand washing guidelines and use hand sanitiser</li></ul>	5	4	20	Staff will require refresher briefing on use & disposal of PPE.  Estates Mgr to review supplies on a weekly basis & order more stock as appropriate to ensure supplies maintained throughout pandemic	5	2	10	Estates Mgr By 2/9/20  Estates Mgt – weekly - ongoing
<b>Vulnerable Staff &amp; Students</b>	Exposure to virus of people considered vulnerable to COVID-19	<ul style="list-style-type: none"><li>Exposure to COVID-19 increases the risk of severe illness to staff who Have specific medical conditions which</li></ul>	<ul style="list-style-type: none"><li>Workforce Planning Questionnaire completed in May to identify staff who are at higher risk should they contract Covid19.</li><li>A risk assessment matrix to determine the level of risk to staff members based on a range of risk factors and their particular job role has been put in place.</li></ul>	5	4	20	Staff asked to advise HR if there is any change to their health that would place them in a higher risk group than previously advised	5	2	10	Director of HR by 11/9/20



		<p>increase vulnerability to infection;</p> <ul style="list-style-type: none"> <li>Other risk factors include age (over 70), pregnancy and those from BAME background</li> </ul>	<ul style="list-style-type: none"> <li>Shielding requirements now paused for most people classified as extremely vulnerable. Individual risk assessments have been carried out for staff previously shielding (high risk category) and more stringent additional arrangements put in place where appropriate;</li> <li>Outstanding risk assessments for staff in the moderate risk category will be completed</li> <li>A risk assessment of students who are considered to be clinically vulnerable and wish to attend college will be undertaken by the Director of Student Services in liaison with parents/carers and the latest medical advice they have received.</li> </ul>				<p>Risk assessments for staff at moderate risk to be completed</p> <p>Identify students who wish to study who are in either of the vulnerable categories</p>				<p>Director of HR by 11/9/20</p> <p>Director of Student Services by 11/9/20</p>
<b>Poor Mental Health &amp; Reporting Health and Safety Concerns</b>	Confusion, solitude, lack of communication, poor or incorrect procedures	Staff and Students Deterioration of mental health	<ul style="list-style-type: none"> <li>Student support services staff continue to remote mental health and wellbeing support to all students;</li> <li>Counselling and wellbeing support will be available face to face as well as remotely from 1/9/20</li> <li>Personal tutors will carry out return to college 1-to-1 discussions with year 13 students on return</li> <li>Staff have been advised of the ongoing counselling provision available</li> <li>Single therapy sessions with the College's Staff Counsellor have been put in place for the first 3 weeks of term for returning staff who are anxious to access support.</li> <li>Wellbeing return to work check-ins with line managers &amp; HR to be available on request;</li> <li>Staff should report any Covid19 related health</li> </ul>	5	2	10	<p>Director of Student Services / Director of HR to monitor arrangements for students / staff and feed back to SLT</p> <p>Reporting Arrangements to be clearly</p>	5	2	10	<p>Director of Student Services / Director of HR</p> <p>Director of Student Services /</p>

			<p>and safety concerns to Claire Bailey. SLT Administrator and the College's Estates Manager</p> <ul style="list-style-type: none"> <li>• Staff can also notify their union representative who can raised concerns on their behalf</li> <li>• Students should raise concerns with the Director of Student Services</li> </ul>				communicated to staff and students				Director of HR by 1/9/20
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### Guidance for completing the Risk Assessment

<b>I</b>	Impact	To establish your risk rating, it is necessary to multiply the perceived consequence (or impact) of the risk (score 1 – 5) with the perceived likelihood (or probability) of that risk occurring (score 1 – 5). See tables below for guidance on risk rating scores.
<b>P</b>	Probability	
<b>R = I x P</b>	Risk Rating	

Impact (or consequence)			Probability (or Likelihood)	
Description	Indicators		Description	Indicators
<b>5</b> - Major	The risk has a major impact if realised		5 – Certain	The risk will emerge
<b>4</b> - Significant	The risk has a major impact if realised		4 – Very probable	The risk should emerge
<b>3</b> – Moderate	The risk has a major impact if realised		3 – Possible	The risk could emerge
<b>2</b> – Minor	The risk has a major impact if realised		2 – Unlikely / remote	The risk is unlikely to emerge
<b>1</b> – No consequence	The risk has a major impact if realised		1 – Improbable	The risk is very unlikely to emerge

Score	Risk Description	Action Required
<b>25</b>	<b>Extreme Risk</b>	<b>Immediate escalation to Principal for risk control activities or to cease activity</b>
<b>15 – 20</b>	<b>High Risk</b>	<b>Risk to be actively managed with appropriate risk control activities. *</b>
<b>6 – 14</b>	<b>Medium Risk</b>	<b>Take appropriate action to manage the risk</b>
<b>5 and below</b>	<b>Low Risk</b>	<b>Risk to be removed from register with monitoring activity to assess changes in risk rating</b>

**\*High Risk Activity must have a written method statement/ safe system of work and arrangements must be made to ensure that the controls are maintained and monitored for adequacy.**