Risk Assessment Policy

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London Metropolitan University | Tower Building | 166–220 Holloway Road | London N7 8DB
Switchboard: +44 (0)20 7423 0000 | londonmet.ac.uk

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1. Introduction

Under the Management of Health and Safety Regulations 1999 London Metropolitan University has a duty to carry out suitable and sufficient risk assessments of the risk faced by their employees and, where appropriate, by non-employees.

London Met has a duty to prevent and control the risks to the health and safety of staff, students and others identified by the risk assessments. Employees must co-operate with employers to help meet legal requirements. This includes prompt reporting of any perceived health and safety hazards. The risk control measures that are implemented should be regularly monitored and reviewed.

This document is solely concerned with the management of risks regarding Occupational Health and Safety, i.e. conditions and factors that affect, or could affect, the health and safety of staff, students or other workers (including temporary workers and contractor personnel), visitors, or any other person in the workplace/ affected by the work activity both on and off campus. For example: carrying out experiments, attending placements, data collection involving people unconnected with Institution, fieldwork, overseas travel etc. These may be further clarified in or expanded upon in specific policy's for those activities.
The management of occupational health and safety risk can affect other risks (e.g. reputation, business interruption/ continuity etc.), and that the management of other risks can impact upon occupational health and safety risk (e.g. risk of failure to meet sustainability benchmarks or risk of failure to provide a good social and working environment).

Our University is in agreement with the Health and Safety Executive (HSE) position that *'risk management is about balancing the benefits and risk and enabling innovation and learning, not stifling them. Sensible risk management is not about creating a totally risk-free society, generating useless paperwork mountains, or scaring people by exaggerating or publicising trivial risks'*[1]

2. Scope

It is recognised that some areas and activities will be less hazardous than others and as such, risk assessments will vary in complexity. For example, offices are inherently less dangerous than laboratories or workshops and some placements may be more hazardous than others. All hazards both on and off the University premises should be considered to ensure risks are properly managed.

This policy sets out to:

- Describe the roles and responsibilities and arrangements to be made by Schools/Departments to ensure that the risk assessment process is a practical one that includes managers and representative staff and students.
- Provide guidance to enable Schools/Professional Service Departments to comply with risk assessment duties as required by relevant law.

[1] Risk assessment - HSE

- Outline the five principal steps to undertake a risk assessment.

3. Legal Requirements

These arrangements will be carried out in full compliance with all relevant health and safety at work legislation.

The exact nature of the legislation applicable will be determined by the nature of the work and will include:

- Health and Safety at Work Act, etc. 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002 (as amended)
- GB CLP (European Regulation on the Classification Labelling and Packaging of Substances and Mixtures 2008 (as amended) retained in GB law)
- The REACH etc. (Amendment etc.) (EU Exit) Regulations 2020

4. Definitions

Hazard is anything with a potential to cause harm.

Accident takes place when someone or something interacts with the hazard and results in harm.

Risk is the combination of the likelihood of a harm occurring and the severity of consequence.

Control measure is method used to eliminate, reduce, or control risks arising from identified hazards.

Hazard register is a single document where all hazards pertaining to a School or Professional Service Department are recorded showing the existence of related risk assessments.

Residual Risk is the level of risk remaining once control measures have been applied to reduce risks.

Risk matrix – a tool, which can be used as part of the risk assessment form aimed to assign a score to the level of risk from an activity / environment / process after existing controls are taken into account. This may help to indicate if additional actions, controls, advice may be needed, and can help with prioritisation of additional actions and controls. It is not a legal requirement to score the risk in this way, but the risk assessment should consider, if controls are suitable and sufficient, and the priority of additional actions required before the activity can take place.

Risk assessment is an evaluation of the above factors and making an informed decision about the likelihood of harm occurring. Risk Assessors should consider the severity and impact of harm and reach a conclusion on the effectiveness of current control measures. If the current controls are inadequate, further measures should be

recommended to eliminate or reduce the potential for harm.

Risk Assessors are those who create or introduce the risk, they should assess and manage the risk and complete the risk assessment.

So far as is reasonably practicable is a principle which allows the degree of risk for the given activity to be balanced against the time, effort, cost, and physical difficulty of avoiding the risk.

5. Roles and Responsibilities

5.1. Deans of Schools and Directors of Professional Services

The Deans of Schools and Directors of Professional Services are responsible for their School/Professional Service Department compliance with the University's procedures and statutory requirements and must ensure that:

- Their School/Professional Service management arrangements for risk assessment and control are adequate.
- All significant health and safety risks are considered and mitigated during the planning stages of organisational changes or the introduction of new systems.
- The hazard register is in place and there is a system for updating and reviewing it.
- Competent persons are appointed to promote, co-ordinate risk assessment, control and to initiate the assessment review process.
- Sufficient processes and resources are allocated for implementation, effectiveness and maintenance of control measures identified in risk assessments.
- Hazardous areas within their service area / school are appropriately managed, and that access control arrangements are appropriate and effective.
- That monitoring, audit, and inspection arrangements are in place (see the requirements of the Monitoring, Audit, Inspection and Review Policy) to ensure continued effectiveness of controls.

5.2. Heads of Departments, Heads of Subjects and Senior Managers

Heads of Departments, Heads of Subjects and Senior Managers are responsible for the implementation of the London Met's risk assessment procedure within their area of control. They must ensure that:

- All significant hazards are captured on the school or departmental hazard register (with assistance of DSLOs).
- There are suitable and sufficient risk assessments in place, appropriately and periodically reviewed and activities with significant risks within their area of management / control or for which they are jointly responsible, especially those recorded on the hazard register.
- The controls identified in risk assessments for their areas of responsibility are implemented.
- That monitoring, audit, and inspection is carried out in accordance with the

requirements of the Monitoring, Audit, Inspection and Review Policy, to ensure the continued effectiveness of controls.
- Hazardous areas within their department or areas of joint responsibility are appropriately managed, and that access control arrangements are appropriate and effective.
- Adequate arrangements are in place within their department or areas of responsibility for the appropriate supervision, instruction and training of staff, students, contractors and visitors, conducting lone work, accessing or working within hazardous areas or undertaking hazardous tasks.
- Ensure that adequate arrangements are in place to comply with the school / service area's retention policy for the retention of risk assessments, audit, inspection, maintenance and monitoring records

5.3. Managers, Supervisors, Principal Investigators and Module Organisers

Managers, Supervisors, Principal Investigators, and Module Organisers must:

- Nominate Risk Assessors or act as such to ensure that risk assessments for their area of responsibility (course and individual / academic activities) are suitably and sufficiently carried out, recorded, appropriately and periodically reviewed.
- Ensure that Risk Assessors attend the risk assessment training offered by the University H&S team, monitor the effectiveness of risk assessments, and oversee the implementation of control measures. These may include the maintenance or purchase of equipment, workstation assessments or health surveillance.
- That suitable and effective access control arrangements, induction training, local rules and codes of practice are in place for hazardous areas within their area of control or joint responsibility.
- Ensure suitable and sufficient risk assessments are carried out before introducing new pieces of equipment or processes especially those which may require alteration to the building's infrastructure.
- Provide staff, students, contractors and visitors with suitable information, instruction and training regarding:
    - Hazardous area induction, relevant access control arrangements including local rules and codes of practice.
    - The nature of the hazards which they may be exposed to and how they may be harmed.
    - The precautions they should take including the any requirements for health surveillance identified in the assessment.
    - The control measures, their purpose and how to use them and ensure they remain effective.
    - The use of hazardous processes and equipment.
    - How to use personal protective equipment and clothing provided.
    - Emergency procedures such as fire and first aid response.

- Ensure that staff have been referred for health surveillance where identified by risk assessment and that staff attend health surveillance appointments.

- Ensure adequate supervision of staff and students conducting lone working within hazardous areas or undertaking hazardous tasks, within their areas of responsibility.
- Ensure that records of risk assessment, inspections, maintenance and monitoring records for their area of control / joint responsibility are kept in accordance with the school / professional service areas retention policy.
- Ensure the provision of suitable PPE to staff where required.

5.4. Staff

Staff are required to:

- Provide their technical knowledge and expertise to the risk assessment process for activities for which they are involved in the organisation of. For example Academic staff are well placed and possess the technical expertise and information to assess health and safety risks and identify control measures to protect students and colleagues.
- Conduct dynamic risk assessment (on site in the moment risk assessment that is not necessarily recorded but allows for the observer to identify hazards and control risks (so far as reasonably practicable) as they are observed or as they arise) during activities which they supervise.
- Follow training and information received as part of the risk assessment and/or induction process.
- Follow safe systems of work or standard operating procedures.
- Participate in health surveillance and workplace monitoring when required.
- Inform their manager and the Health and Safety Team of unsafe conditions or equipment posing imminent danger.
- Report any shortcomings in risk control arrangements to their management and the Health and Safety Team.
- Avoid putting themselves or others at risk by their acts or omissions.
- Wear the Personal Protective Equipment (PPE) provided to them as trained and instructed, store and report damage in accordance with that training and instruction.
- Provide information and instruction to students within their area of oversight.

5.5. Students

- Follow training and information received as part of the risk assessment and/or induction process.
- Follow safe systems of work or standard operating procedures.
- Inform as appropriate academic, technical, security, reception or other supervising staff of unsafe conditions or equipment posing imminent danger.
- Report any shortcomings in risk control arrangements as appropriate academic, technical, security, reception or other supervising staff.
- Avoid putting themselves or others at risk by their acts or omissions.
- Wear the Personal Protective Equipment (PPE) provided to them as trained and instructed, store and report damage in accordance with that training and instruction.

5.6. Health & Safety Team

- The University's Health and Safety Team will, coordinate with the Learning and Development Team (L&D Team), to provide training, advice, and guidance on the provision of risk assessment.
- The Health & Safety Team is responsible for the review and development of the university's risk assessment policy and arrangements.
- The development and the provision of university risk assessment forms to aid in the risk assessment process.
- Audit, monitor and review the adequacy and effectiveness of the university risk assessment arrangements.
- Ensure that relevant information relating to hazardous areas are identified in the Fire Risk Assessments and that this information is available to the emergency services.
- Provide competent professional and technical advice on risks and risk assessment.

5.7. Departmental Safety Liaison Officers (DSLOs)

DSLOs are expected to provide advice and support within their department to help

- Develop, update and monitor the Hazard Register (see section 9) locally and ensure gaps are brought to the attention of the relevant manager.
- Report any shortcomings in the risk management process, observed or brought to your attention, to local management/ the Health & Safety Team and support staff with reporting and raising of issue to the Health and Safety Team.

6. The Five Steps of the Risk Assessment Process

6.1. Identify hazards

Hazards relating to each work activity should be identified, ignoring the trivial and concentrating on significant hazards which could result in harm or affect several people.

Hazards may be identified by observing the workplace, examining processes/activities, seeking staff and students' views and input, checking supplier's data sheets and manufacturer's instructions or by examining accident/ill-health records.

Typically, hazards will include:

- Physical hazards, e.g. machinery, noise, electricity, fire, vibration, work at height, etc.
- Ergonomic hazards, e.g. working space, workstation layout, repetitive movements, etc.
- Chemical hazards, e.g. asbestos, cleaning and laboratory chemicals, paints, biological agents.

Information is essential to the process of identifying hazards and completing the risk assessment. There are a few sources:

- Legislation and supporting codes of practice.
- HSE guidance.
- University Safety Procedures and guidance.
- Product information.
- Relevant UK, European and International standards.
- Industry and HE sector guidance.

6.2. Assess the risks

Decide who might be harmed and how they may be harmed. Consider employees, students, visitors, contractors, cleaners, and maintenance personnel who may not always be in the workplace but could be harmed by the activity/process/equipment.

Special consideration should be given to young and inexperienced persons, those with disabilities or chronic illness, or new and expectant mothers. It is better to consider these persons during routine risk assessment, rather than waiting for 'ad hoc' self-reporting by the individual.

6.3. Control the risks

a) Identify existing control measures

b) Identify if the any residual risk remains and ask yourself;

- Can I get rid of the hazard altogether?
- If not what further actions are reasonably practicable to further reduce the risks so that harm is unlikely.
  - Identify who is going to carry out these actions.
  - Identify when the action needs to be carried out by.

Risk control measures must:

- Take account of the University's procedures and statutory requirements (Some statutory duties are absolute and must be complied with).
- Be subject to continual review and revision.
  Maintaining risk control measures requires adequate inspection, maintenance, monitoring and review procedures, so that if conditions change to the extent that hazards and risks are significantly affected, then risk assessments and control measures should also be reviewed.
- Take in to account requirements under other legislation
  The Equality Act 2010 makes it unlawful for an employer to treat a disabled person less favourably because of a reason relating to their disability, without a justifiable reason. Employers are required to make reasonable adjustments to working conditions or the workplace where that would help to accommodate a particular disabled person.

- Controls must reduce risk as far as is reasonably practicable.
  It should be noted that use of personal protective equipment (PPE) as a control measure is acceptable only when no other action can be reasonably taken to eliminate or reduce the risk.
  Risk control measures are to be guided by the Hierarchy of Controls, and the principles of prevention described in The Management of Health and Safety at Work Regulations 1999.

6.3.1 Hierarchy of Controls

1. Eliminate the risk – Physically removing the hazard
2. Substitute the risk – Replacing the hazard
3. Implement Engineering Controls – Isolating people from the hazard
4. Administrative Controls – Changing the way people work
5. Personal Protective Equipment (PPE) – Protecting

6.3.2. Principles of Prevention

a) Avoiding risks;
   If possible, avoid a risk altogether, e.g. perform the work in a different way to eliminate a hazard from the process. – eg not working at height by adapting the task to be carried out at ground level.

b) Evaluating the risks which cannot be avoided;
   by carrying out a risk assessment

c) Combating the risks at source;
   Rather than taking palliative measures, e.g. re-routing a cable in a more effective way to prevent tripping rather than putting up a warning sign.

d) Adapting the work to the individual, especially as regards to the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health;
   This means consulting with those involved in the work when designing the workplace and selecting protective clothing and equipment. Increasing the control that an individual has over their work and avoid monotonous work.

e) Adapting to technical progress;
   Take advantage of technological and technical progress which often offers opportunities for making the work safe, e.g. automation of risky work.

f) Replacing the dangerous by the non-dangerous or the less dangerous;
   For example replace an extremely flammable substance a less flammable substance, reducing the quantiles of hazardous substance used, or replacing fine powders with more course materials such as crystals or pellets.

g) Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the

influence of factors relating to the working environment;
The prevention policy should cover how you will reduce risks that cannot be eliminated. This should seek to reduce risk as low as reasonably practicable (ALARP), and this often means using several controls.

h) Giving collective protective measures priority over individual protective measures;
Give priority to those measures that protect the whole workforce, rather than measures that only protect employees on an individual basis

i) Giving appropriate instructions to employees.

6.3.3. Risk assessment Matrix

If the risk assessment template contains a risk matrix, risk assessors are encouraged to consider the likelihood and severity of an adverse effect from the identified hazard after the existing controls have been factored in. Scoring the risk in this way is not a legal requirement and it is not a substitute for assessing the risk (See 6.2), however scoring against a matrix may help to identify the level of risk and if further controls, are required (low/medium risk) or if the activity cannot go ahead without consultation with H&S team (high risk).

6.4. Record your findings

The preceding steps represent a process of gathering information, thinking, and planning, now we need to record the significant findings of he risk assessment:

- The hazards (things that may cause harm)
- Who might be harmed and how
- Any group of individuals identified as specially at risk.
- What you are doing to control the risks
- What further actions need to be taken to control the risks
- Who is going to carry out each of these actions
- When each the action needs to be carried out by.

In the risk assessment a reference can be made to other documents which explain existing and relevant safety arrangements e.g. departmental procedures for using equipment, safe systems of work, manufacturer's instructions engineering controls, structural features etc.

6.4.1 Risk assessment templates

A general risk assessment template has been provided and should be used for recording risk assessments unless there are other specific risk assessment templates provided by the Health & Safety Team.

6.4.2 Dynamic Risk assessment

Remember that even if a risk assessment has been carried out, this might not be enough to protect you in dynamic, changing conditions, where there may be a need

to make decisions on the spot, at these times it is suitable to conduct a dynamic risk assessment.

One of the purposes of a dynamic risk assessment is to highlight if a situation is too dangerous to proceed and allow staff to make an informed judgement call.
It is worth noting that dynamic risk assessments conducted by employees do not need to be recorded though any findings or insights discovered as a result of a dynamic risk assessment should absolutely be communicated back to superiors and other staff. The lessons learned from a dynamic risk assessment can be used for regular, recorded risk assessments and to develop an up-to-date standard operating procedure.

When conducting a dynamic risk assessment take a moment to stop, think, identify hazards, consider risk, plan immediate actions for resolution.
Don't forget to consider the consequences of a given course of action. It may also be beneficial at these times to consult with people around you if possible

An real life example of a dynamic risk assessment practice, would be looking both ways before crossing the road, or deciding to walk further up the street to a crossing point.

6.5. Review the assessment

Risk assessments must be kept up to date and reviewed periodically to ensure that they remain valid.
Identify a review frequency based on the risks and ensure that the risk assessment is reviewed within this frequency (record the next review date) where it is not otherwise triggered for earlier review.

Circumstances will inevitably change over time or new equipment and processes/activities will be introduced into the workplace. If these result in a significant change in the risk rating, then the assessment must be reviewed to assess the risk arising from these changes.

6.5.1. Factors that may necessitate an automatic re-assessment include:

- A change in legislation.
- A change in control measures.
- Any significant change in the work carried out.
    - Change in Key Staff or contractors,
    - Significant change in the process
    - Change in location of activity
- Transfer to new technology.
- After an accident, incident or near miss.
- Any other reason to suspect that the original assessment is no longer valid or could be improved.
- At or before the agreed period of review (based on the hazards and the risks).

7. Communication

It is important to ensure that the findings of the risk assessment are communicated to all those who are affected by the activity. This can be done locally but should also be shared with those who are not affected by that activity but manage similar activities. It is also important that risk assessments and proposed actions are discussed with staff representatives. This can be done locally and as part of the local committees.

Where a high risk to safety of University staff/ students or others has been identified and escalated to senior members of staff, the Health and Safety Team should be notified and kept informed (whatever the cause). They will provide advice on whether the risk assessment prepared is 'suitable and sufficient' and advice regarding the implementation of further controls.

Risk assessments will be requested as part of periodic health and safety inspections/audits and should be made readily available to anyone requiring them.

The senior manager of the area responsible (with specialist, professional advice from the reports etc.) would take the decision as to whether the risk to safety has been appropriately managed and therefore whether the activity should proceed but the Health & Safety Team retains the ability to prevent the specified activity from going ahead and also to escalate concerns, if appropriate.

8. Training

L&D Team, in consultation with the Health & Safety Team arrange and deliver health and safety training for University's employees. Employees who are required to carry out risk assessment must attend the training identified in their departmental Training Matrix. University Training matrix can be found following the link in the Health and Safety Training Policy.

9. Hazard Registers

Schools and Professional Services are required to populate a Hazard Register based on their activities. The Hazard Register is intended to prompt and inform the risk assessment process by providing a single reference source of hazards which can be used to ensure significant risks have been assessed. It is a useful local management tool but will also be used to inform the University's health and safety risk register. A Hazard Register template is available from H&S team. Low risk departments are provided with generic hazard register, while high risk departments (e.g. those selected for internal H&S audit cycle) are required to maintain School/Departmental hazard register.

The Hazard Register should be maintained by the DSLO but owned and signed of by the Dean/Director.
The status of the Hazard Register is reported annually to the University H&S Committee, and any School/Department with outdated Hazard register will be reported to the SLT.

10. Further Information and Support

Further information on risk management is available from HSE: Information about health and safety at work

Guidance and support on risk assessment is available from the Departmental Safety Liaison Officers and the Health & Safety Team.

11. References and further reading

Risk assessment - HSE