**Updated Generic Risk Assessment (12/6/20 – Ballantrae Primary/EYC)**

This risk assessment should be updated in consultation with staff and to reflect local mitigation factors required in your establishment. All additional information added should be in red.

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|  **Description of Task/Activity** | **Return to work - potential exposure to COVID-19 in SAC Education establishment.** ***Please read current Return to Work Guidance (link) and*** [***Coronavirus: re-opening schools guide***](https://www.gov.scot/publications/coronavirus-covid-19-re-opening-schools-guide/pages/how-to-use-this-guidance/) ***prior to developing or reviewing.***  | **Directorate** | People | **Assessor(s)** | Yvonne Templeton Ballantrae Primary School  |
| **Service**  | Education |
| **Reference** **No** | 15/06/2020V2-BallantraePS/EY | **Last Review Date** | 29/05/2020 |

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| Persons Identified at Risk ( Direct and Indirect)*Employees (Teachers, support staff, admin staff), pupils, parents/carers, visitors and maintenance personnel. N.B. New and expectant mothers require a separate risk assessment.***All employees – regardless of sector - are entitled to use their own initiative or apply discretion with regard to additional PPE or further mitigations should they consider this necessary. We are all operating in unprecedented times and employees will not be discouraged from taking sensible precautions. The principles of dynamic risk assessment should be encouraged, i.e identifying risks and appropriate control measures as they arise, where circumstances dictate.** |

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| **Severity** | 1. Minor: Near miss incident or minor injury | **Likelihood** | 1. Unlikely |
|  | 2. Moderate: Injury / Ill health |  | 2. Possible |
| 3. Major: Serious injury or ill-health | 3. Likely |
| 4. Critical: Significant injuries and cases of ill-health | 4. Very Likely |
| 5. Catastrophic: Single or multiple fatality | 5. Almost Certain |

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| **Hazards Identified** | **Person(s)** **at Risk** | **Types of Loss/****Injury/Ill Health** | **Current Control Measures** |
| 1 | General contact with others (colleagues, pupils, members of the public) in the school environment in light of Covid-19. | Employees Pupils | Potential to contract Covid19 and suffer associated health effects. | **An information pack will be sent to all parents outlining the measures included within this risk assessment which impact education service delivery for young people.** **1.1 Hygiene** The following measures have been taken to maintain personal and workplace hygiene**1.1.1** Personal Hygiene – All employees and young people have been made aware that good hand and forearm hygiene is essential at all times - thorough and regular washing of hands and forearms for at least 20 seconds with soap and water and/or use of hand sanitising gel/alcohol based wipes. This should always be done before eating and drinking, and after coughing, sneezing or going to the toilet. When using alcohol based hand sanitising gel you must let your hands dry fully before touching any surfaces, especially ‘conducting’ surfaces i.e. metal, due to its flammability properties. All employees and young people are aware to refrain from touching the nose, mouth or eyes and all pupils are frequently reminded of this.We encourage staff and pupils to wash or sanitise hands before and after travelling.Clear notices are posted in schools to reflect this **1.1.2 Workplace Hygiene** –We have implemented revised cleaning measures (in addition to those provided by Facilities Management/Facilities Management Services (PPP,DBFM schools) as follows;We provide cleaning materials in order that frequently touched surfaces can be cleaned regularly throughout the day and **all staff are aware that they should be involved in this process, irrespective of role.** The frequently touched areas which we clean regularly have been identified as, but not restricted to;* tables, chairs, resources, equipment, doorknobs, light switches, countertops, handles, toilets, taps, sinks and electronics, such as tablets, touch screens, keyboards, telephones and remote controls.

Personal Work Stations (eg teacher desks, office desks)- All desk hard surface areas to be cleaned by the employee. This to include, desk, chair arms, keyboard, mouse and any other items regularly touched or handled. Telephones to be sanitised at start and end of the day with appropriate sanitiserUsing appropriate cleaning products and disposable paper towels, hard surfaces should be cleaned on a regular basis.All cleaning will be carried out in accordance with [COVID 19- guidance for non-healthcare settings](https://hpspubsrepo.blob.core.windows.net/hps-website/nss/2973/documents/1_covid-19-guidance-for-non-healthcare-settings.pdf).A cleaning regime for each school will be provided by Facilities Management or Mitie. This will detail the cleaning arrangements for each school.Shared resources should be avoided or kept to a minimum and must be cleaned in between each use. Young people are not permitted to bring in toys or personal belongings from home. The information pack sent to all parents reflects this position. We have instructed all school employees to keep personal items to a minimum in the workplace. They have been advised not to share personal items, stationery, crockery etc.We have provided hand sanitiser on entering and leaving the building and in other communal or public areas*.* Signage will be posted to highlight these areas**.**Staff are aware that all cleaning materials should be disposed of in a general waste bin which will be emptied daily by a Facilities Management employee or Facilities Management provider (DBFM, PPP). We have communicated with the Facilities Management provider and understand our roles (PPP, DBFM)**1.2. Physical Distancing**A capacity assessment for the initial phase of re-opening has been carried out and takes consideration of the total number of available staff (both teaching and support staff), including estimates on staff absence rates based upon shielding requirements and the impact of successful TTIS (test, trace, isolate, support) practices or ‘**Test and Protect’** as it is called in Scotland. Physical distancing in staff spaces (such as staff rooms, toilets etc.) will also form part of the capacity considerations.Following [guidance on physical distancing](https://www.gov.scot/publications/coronavirus-covid-19-physical-distancing-in-education-and-childcare-settings/pages/physical-distancing/), [re-opening schools guide](https://www.gov.scot/publications/coronavirus-covid-19-re-opening-schools-guide/pages/how-to-use-this-guidance/) and South Ayrshire’s Local Phasing Recovery Plan and Operating Guidance for Schools we have adopted practical measures and procedures to ensure physical distancing by increasing distance and decreasing interaction is in place and can be maintained throughout the work activity in our school environments throughout the day. This includes arriving at school, taking food/toilet breaks, when accessing communal areas and when leaving the school environment. These are outlined in paragraphs below;We have communicated the following advice/information to employees, parents/carers and young people;**1.2.1 Travel to School*** We encourage young people and staff to walk or cycle to school and instruct them to adhere to physical distancing at all times.
* Young people using school transport to follow guidance from education/ contractor – this information has been provided in the information pack sent to parents/carers.
* We have advised employees, parents/carers and young people to utilise their own transport in preference to public transport where walking and cycling are not possible.
* If public transport cannot be avoided, the employee should be encouraged to follow current government advice in respect of “face coverings”.
* Parents should not use onsite car parking facilities

**1.2.2 Arrival and departure from school** * We have assessed arrival and departure times and opted to stagger theses as follows – *See attached parents’ information sheet* Alteration to school hours has been agreed following consultation. Clear guidance has been issued to parents and young people in the communications provided. This is to avoid congregating in playground areas
* Drop off and pick up is limited to 1 adult per family. Parents/carers must leave the playground immediately following drop off/ pick up. This information has also been included in the information pack. Staggered drop off/pick helps prevent school gate socialising

**1.2.3 Physical Distancing within the school**We have assessed the measures necessary to maintain physical distancing by increasing distance and decreasing interaction within schools and agreed to the following measures. This information has also been provided in the information pack. * Teaching in smaller groups, with a degree of rotation / alternation.
* Where practicable, minimising the mixing of such groups.
* Breaks being staggered by class, to avoid pupils from different classes coming into contact where possible (particularly when indoors and some more enclosed outdoor spaces).
* Seating positions being re-organised so that pupils are a safe distance apart (for example, 2m when seated at desks). Pupils are seated so as not to face each other.
* Quarantined desks to be clearly indicated with “Out of Use” signage, excess chairs to be kept in classrooms where possible.
* Increased use of outdoor spaces or alternative Council owned or community facilities.
* Movement around school is limited as much as possible with one way systems and external circulation implemented if required (also see 2.5 – general precautions). Signage and floor markings support this. Age appropriate supervision is in place.
* Toilets – gathering in toilet areas is strongly discouraged and measures have been put in place in our school to prevent this as follows: onsite janitors will be informed to monitor use of toilets.
* Furniture is arranged to maintain physical distancing.
* Young people sit at the same desk if attending on consecutive days if feasible.
* Where practicable, we endeavor to ensure that Teachers, rather than pupils, move to other classes. Teachers will aim to remain with the group of young people they are allocated to and not come into contact with other groups where possible.(EY, Primary, Special Schools, ASN Bases)
* We endeavor to ensure that numbers of Teaching/support staff in School at any one time is limited to only those required to teach/support the expected occupancy levels on any given day.
* Appropriate arrangements are made to cater for individual needs on a case by case basis and particularly for children with severe and complex needs where handling and personal care is required, in line with legislative requirements. (Additional space will be required for some children and young people with additional support needs who rely upon the use of equipment, such as hoists, particularly where this provision is provided in a mainstream school setting. Additional precautions are implemented under such circumstances, including individualised risk assessments. *See Early Years Risk Assessment for changing children.*
* Staff members have been instructed to adhere to physical distancing during breaks.
* Meetings and training sessions will be conducted through virtual conferencing where possible.
* Only employee’s whose job requires to be carried out on-site should travel to the site whilst the governments stay at home advice exists. Home working should be retained in place where possible.
* Flexible shift patterns should be adopted, where appropriate, to reduce the risks associated with a historical rush hour commute and office start times. (Flexibility would mean staff only need to be on-site when required for activities that they are unable to do at home).

**1.2.4 Visits*** Visitors are not permitted to the school unless essential and with prior appointment (e.g. essential building maintenance).
* Where essential visits are required these will be made outside of school hours where possible.
* Parents are not permitted to enter the school building without an appointment.
* New family show rounds will be done virtually or outside of school hours.
	+ - **General Precautions**

We have considered and included the following general precautions *:*We have considered how pupils get into the school to avoid bottlenecks and areas of congestion as follows: Children will enter by assigned doors – Early Years – EY entrance; P1Main Door; Taxi children – by backdoor from community carpark; all other children – children’s main doorWe have installed physical barriers/screens in key areas as follows: Gym hall for excess furniture.We have revised office/school layout to facilitate physical distancing as follows; photocopier moved to main corridor outside main office.We manage access to communal areas such as kitchens, meeting rooms, mail and print rooms, staffrooms, kitchens and toilets as follows: 2 adults at any one time. Staff responsible for sanitising area after use. We have displayed notices/posters advising of measures in place e.g. hygiene (personal and workplace), hand sanitising stations, safe working, physical distancing and access to communal areas.We have halted hot-desking until further notice. Where reception desks operate, measures are in place to ensure that they are thoroughly cleaned between users.We have considered staggered work days/weeks, start/finish and lunch times and agreed the following : See attached parents information sheet.We have considered staff cohorting – if practical - to keep fixed, small working groups separate from others and agreed the following: classes supported by same support staff each day. Our PE changing facilities are being managed as follows; children wear appropriate clothing to school to allow for PE.We have agreed a revision to our First Aid arrangements to allow for physical distancing as follows: Key first aider to administer first aid when required – Ms McCathie – following NHS guidance. First aid recorded and parents informed. We maintain registration procedures and have made other revisions for Fire Safety – our evacuation plan and assembly point arrangements have been reviewed to reflect this (refer to guidance (link) if required). Information and instruction on any revisions to fire safety arrangements have been made to all school staff and pupils.**1.2.6 Attendance** * Staff and young people should only attend school if they are symptom free, have completed the required isolation period or achieved a negative test result*.*
* Any staff member or child who has been told to shield cannot attend school and should be supported to work/be educated at home. Staff or children who are in the higher risk category (clinically vulnerable) should be encouraged to work from/educated at home where possible. If they require to go to school an individual risk assessment should be undertaken in line with the national guidance.
* Staff/children who live in a household with someone who has been advised to shield should only attend school if they are able to stringently adhere to physical distancing.
* Only parents who are symptom free and or have completed the required isolation periods will be permitted to drop off or collect their child. (Information on attendance and any alternative arrangements have been provided in the communications with parents/carers).

**1.2.7. Personal Protective Equipment** The Personal Protective requirements for our specific Service are detailed in the Operational Guidance for schools and will be informed by risk assessments for individuals or activities. Further specific requirements for our school are as follows………. *N/A*Where physical distancing cannot be achieved a risk assessment to determine any PPE required must be carried out.(e.g personal care, attending to a young/unwell pupil)* If a child, young person or other learner becomes unwell with symptoms of coronavirus while in their school setting and needs direct personal care until they can return home, a fluid-resistant surgical face mask should be worn by the supervising adult if a distance of 2 metres cannot be maintained. If contact with the child or young person is necessary, then disposable gloves, a disposable apron and a fluid-resistant surgical face mask should be worn by the supervising adult. If a dynamic risk assessment determines that there is a risk of splashing to the eyes, for example from coughing, spitting, or vomiting, then eye protection should also be worn

Our teams are instructed in how to utilise all PPE provided and how to access replacement PPE. Our teams are aware of reporting procedures should they have concerns over any PPE issued. **1.2.8 General** **Our staff are aware of the following general precautions;**Out with School EnvironmentTo self isolate for 7 days if they have any symptoms of Covid 19, including anosmia and refer to [NHS inform website](https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19). Self Isolation is required for 14 days if you live with a confirmed case or someone displaying symptoms of Covid-19. If you develop symptoms within the 14 days you must self isolate for a further 7 days – refer to NHS inform website. This information is also provided to parents in the information pack. Where contact has been made with a person who is suspected or confirmed to have COVID-19 contact your School Management Team or Education Human Resources and discuss any requirement to self isolate. Where cases are identified in employees, public health advice will be implemented to assess the risk to other employees or pupils who have been in contact with them.Within School Environment The actions to be taken if someone becomes unwell with symptoms of COVID-19 while in the school environment are outlined as follows and can be found in the document [COVID -19- Guidance for non health care settings.](https://hpspubsrepo.blob.core.windows.net/hps-website/nss/2973/documents/1_covid-19-guidance-for-non-healthcare-settings.pdf)Symptomatic Individuals* If a child begins displaying a continuous cough or a high temperature, they will be sent home to isolate as per the guidelines.
* A child awaiting collection will be moved, if possible and appropriate, to a room where they can be isolated behind a closed door. If it is not possible to isolate them, they should be moved to an area which is at least 2 metres away from other people. A window should be opened for ventilation where possible.
* If the child needs to go to the toilet while waiting to be collected, the toilet will be cleaned and disinfected using standard cleaning products before being used by anyone else.
* The area where the child is waiting to be collected will be thoroughly cleaned.
* If a child or member of staff becomes ill with symptoms of COVID-19 they will be tested (if over 5yrs old) . They will only be allowed back to school after a negative test result or appropriate isolation has finished.

If clinical advice is needed, the staff, parent or guardian should go online to NHS 111 (or call 111 if they don’t have internet access)We will ensure that all employees and parents are advised in the information pack that if anyone (staff or pupil) over the age of 5 has any of the symptoms of Covid-19 (a new continuous cough, temperature or loss or change of taste or smell, is advised to immediately visit [NHS inform](https://www.nhsinform.scot/) or call 0800 028 2816 to arrange testing**1.2.9. Communication / Information / Instruction*** All staff members receive appropriate instruction and information on infection control and have read and understood the guidance relating to COVID-19 and the risk assessments within which they will be operating. Staff training records will be kept and maintained. A presentation will be issued to all schools for communication with all staff to support this.
* Parents/carers have received a school information pack and receive regular clear communication regarding the role they play in safe operating procedures and all measures being taken to ensure the safety of their young people and themselves.
* Signage to be put in place identifying maximum numbers allowed in each room.
* No communal food, i.e. sweets, biscuits etc allowed in classrooms and staff bases.
* Regular checkpoint meetings to discuss what is going well, concerns, suggestions, risk assessment, Health and Safety reps, if available, to be present and meetings minuted.
* Pro-active monitoring that all the school controls and social distancing measures are being adhered to by staff and pupils.
* Reporting of any breaches to management for investigation
* Appointment of “safety marshal” roles on site to monitor and enforce compliance on a day to day basis. – Mrs Sloan (Principal Teacher)

**For Information Only** Our teams are aware that the Scottish Government has published guidance on the use of textile face coverings by members of the public for situations where physical distancing is not possible. South Ayrshire Council endorses this approach and strongly recommends that all Council Employees follow the guidance and wear face coverings in specific circumstances (ie. for short periods of time in crowded **public** situations, enclosed **public** spaces including **public** transport). This precautionary guidance should not be seen as an alternative to the PPE guidance for work activities described above. The face coverings advice is also not intended as an infection prevention and control measure for the workplace or a means of substituting the health and safety mitigations in this risk assessment. Face coverings should be considered as a **non-mandatory** enhancement to agreed physical and procedural adjustments for COVID-19 and useful under circumstances where proximity to others is considered a risk. **Physical distancing, personal and workplace hygiene, remain scientifically proven to be the most important and effective measures to prevent the spread of coronavirus.** |
| 2 | Mental health which may be affected by COVID-19/social or workplace isolation. | EmployeesPupils |  | **2.1 Measures for staff wellbeing**We have considered the effects of the current national situation and personal circumstances of our employees. If required we have completed the Mental Health and Wellbeing sample Risk Assessment (link) and will seek further advice from colleagues in HR, Risk and Safety or Occupational Health as it is needed. We are aware that we have access to;The resources on the [Healthy Working Lives page](https://ww20.south-ayrshire.gov.uk/corporateservices/corporateresources/healthandsafety/healthyworkinglives/SitePages/Home.aspx) on the CORE for current advice on maintaining and supporting employee health and well being.The sample Mental Health and Wellbeing COVID-19 risk assessment Health and Safety COVID-19 page on the CORE. The [HR Stress Management Guidance](https://thecore.south-ayrshire.gov.uk/media/270/Dealing-with-stress-guide-for-managers/doc/Dealing_with_Stress_-_Guide_for_Managers.doc?m=637110758799070000) under policies and procedures and consider undertaking stress risk assessment for those affected. [Risk, Safety & Resilience - Forms (Health and Safety)](https://ww20.south-ayrshire.gov.uk/corporateservices/corporateresources/healthandsafety/SitePages/Forms%20%28Health%20and%20Safety%29.aspx?WikiPageMode=Edit&InitialTabId=Ribbon.EditingTools.CPInsert&VisibilityContext=WSSTabPersistence) The Return to Work Guidance document produced by Risk and Safety Team. (link) * Wellbeing champions established within the school and information available for coping techniques.
* Wellbeing checks to be incorporated at regular meetings.

**2.2 Measures for the wellbeing of young people*** Young people taking time to settle after prolonged break and the change in routine will be supported by staff. All measures should be taken to minimise contact between the parent and other young people and staff members.
* Young people are supported in developmentally appropriate ways to understand the steps they can take to keep themselves safe including regular hand washing and sneezing into a tissue.
* Young people are supported to understand the changes and challenges they may be encountering as a result of COVID-19 and staff need to ensure they are aware of young people’s attachments and their need for emotional support at this time.
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| 3 |  |  |  | **3.1 Consultation -** We have consulted with Trade Unions Representatives and/ or employee groups in the development of these mitigations. Catering and FM Management teams have been appropriately involved in the development of risk assessments.**3.2 Signatory -** We can confirm that we have displayed the poster relating the Risk Assessment of our workspace as outlined [*here*](https://ww20.south-ayrshire.gov.uk/corporateservices/corporateresources/healthandsafety/Posters/Workspace%20Risk%20Assessment%20Poster.pdf) . It is signed by a Chief Officer, Service Lead or Duty Holder. |
| **Risk Rating Number (RRN) with existing Control Measures:** |

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| 1 |

 **Severity x Likelihood** = R**isk Rating**

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| **HIGH:** **[ ]  MEDIUM: [ ]  LOW: [x]**  High = 12 to 25 Med = 4 to 10 Low = 1 to 3 |
| **Additional Recommended Control Measures** | **Action By** | **Planned****Completion Date** | **Date****Implemented** |
| 1 | Continue to review risk assessments and ensure current Scottish Government and NHS Inform guidance is strictly followed as it is updated.  | Yvonne Templeton  | Ongoing  |  |
| 2 | Add further mitigations as required  |  |  |  |

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| **Risk Rating Number (RRN) after implementation of additional Control Measures:** |

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  Severity x Likelihood = Risk Rating |
| **HIGH: [ ]  MEDIUM: [ ]  LOW: [x]**  High = 12 to 25 Med = 4 to 10 Low = 1 to 3 |
| **Name of Assessor(s)** (PRINT) | Yvonne Templeton  |  **Assessment Date** | 15/06/2020 |
| **Assessor(s) Signature(s)** |  | **Review Date** | As situation develops |
| **Designation** | Head Teacher  | **Assessment Reviewed by** |  |
| **Name of Manager /Person Responsible for ensuring above is implemented**(PRINT) | Yvonne Templeton Clare Sloan – Principal Teacher  | **Scottish Government -** * [Re-opening schools guide](https://www.gov.scot/publications/coronavirus-covid-19-re-opening-schools-guide/pages/how-to-use-this-guidance/)
* [Coronavirus in scotland](https://www.gov.scot/coronavirus-covid-19/)
* [Physical distancing in education and childcare settings](https://www.gov.scot/publications/coronavirus-covid-19-physical-distancing-in-education-and-childcare-settings/pages/physical-distancing/)
* [Test and Protect – advice for employers](https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect-advice-for-employers/)
* [Strategic framework for re-opening schools, early learning and childcare provision](https://www.gov.scot/publications/excellent-equity-during-covid-19-pandemic-strategic-framework-reopening-schools-early-learning-childcare-provision-scotland/pages/6/)

 **Health Protection Scotland -** * [Guidance-for-non-healthcare-settings.pdf](https://hpspubsrepo.blob.core.windows.net/hps-website/nss/2973/documents/1_covid-19-guidance-for-non-healthcare-settings.pdf)

**CoSLA** * [Information for councils](https://www.cosla.gov.uk/covid-19-information-for-councils)

**Health and Safety Executive** * [Latest information and advice](https://www.hse.gov.uk/news/coronavirus.htm)

**NHS guidance** * [NHS Inform](https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19)
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| **Signature** |  |
| **Designation** |  |

**HEALTH AND SAFETY RISK ASSESSMENT GUIDANCE**

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| **Hazard** | Hazard is an event or situation, which has the **potential** to cause harm (loss, damage, injury, ill-health, psychological harm, industrial disease or death) |
| **Risk** | Risk is the **chance, or likelihood,** that the harm will occur from a particular hazard |
| **Examples** | 1. Faulty wiring is a **hazard**, which could result in the **risk** of electrocution or fire.
2. Verbal or Physical Abuse is a **hazard**, which could result in the **risk** of injury and / or psychological damage
3. Exposure to hazardous substances is a **hazard**,which could result in **risk** or ill-health or industrial disease
 |
| We require to estimate how likely a risk is to materialise and how severe the consequences might be, in order to **prioritise** the necessary preventative action. |

**QUANTIFICATION OF RISK**

**Estimation of Severity** -The severity column should be used to estimate the severity of impact, should the risk arise.

**Estimate of Likelihood** -The likelihood column should be used to estimate the chance of the risk occurring.

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| **Severity** |  | **Likelihood** |
| 1 | Minor |  | 1 | Unlikely |
| 2 | Moderate | 2 | Possible |
| 3 | Major | 3 | Likely |
| 4 | Critical | 4 | Very Likely |
| 5 | Catastrophic | 5 | Almost Certain |

When selecting the **“severity”,** we need to consider how the risk would impact in terms of level of loss, injury or ill-health. We need to consider what is most probable, rather than what is possible.

When selecting the **“likelihood”,** we need to consider the exposure frequency, e.g. dealing with an aggressive customer, as a ‘one off’ is less likely to have an impact than being exposed to aggressive customers on a daily basis.

**Risk Rating = Severity x Likelihood**

The Risk Rating Matrix outlined below is a tool with which the risk rating can be classified, and is accepted as a means of analysing South Ayrshire Council Health and Safety Risk and whether this is considered to be **HIGH, MEDIUM** or **LOW**. Risks rated at **4** or above require to be addressed, in order that they can be reduced to the lowest level reasonably practicable. Those below **4** should be continually monitored, (and addressed where resources permit).

**Risk Rating Matrix**

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| **5** | **10** | **15** | **20** | **25** |
| **4** | **8** | **12** | **16** | **20** |
| **3** | **6** | **9** | **12** | **15** |
| **2** | **4** | **6** | **8** | **10** |
| **1** | **2** | **3** | **4** | **5** |

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| **High** | 12 - 25 | Immediate risk reduction required. |
| **Medium** | 4 - 10 | Risk reduction measures required. |
| **Low** | 1 - 3 | Address where resources permit and continue to monitor regularly, as risks can increase over time. |

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