Quick guide: Risk assessment and controls

Adapted from the [Health and Safety at Work Act 2015 practical guide.](https://assets.education.govt.nz/public/Documents/Ministry/Initiatives/Health-and-safety/Tools/Health-and-Safety-at-Work-Act-2015-practical-guide.pdf)

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# Role of the board as PCBU

The Person Conducting a Business or Undertaking (PCBU) is usually a legal or corporate entity, including a self-employed person. In a school the PCBU is the board.

As the PCBU, the board holds the primary duty of care to ensure the health and safety of everybody involved with the school “so far as is reasonably practicable”.

The board usually delegates the implementation of health and safety policy to the principal, who develops appropriate procedures and practices to ensure obligations and expectations are met. The board may delegate any of its functions or powers but can never delegate its accountability.

Even if your school already has good health and safety management in place, with the changes to the vaccine mandate and My Vaccine Pass, it is recommended that you review it and ensure that it reinforces an active culture among all those at the school, including ākonga.

A formal risk assessment enables the board to understand what the significant hazards in their school are. More importantly, it helps the board to focus on the significant risks, rather than using their resources trying to manage every risk.

# Managing risks

Risks must be managed by taking action to eliminate them, and if that is not reasonably practicable, minimising them. Eliminating a hazard will also eliminate any risks associated with that hazard.

* Hazard = a situation or thing with the potential to cause death, injury or illness
* Risk = the likelihood that death, injury or illness might occur when exposed to a hazard

Risk assessment involves considering the **severity of consequences** if a person is exposed to a hazard, combined with the **likelihood** of it happening. The level of risk will increase as the likelihood of injury/illness, or it’s severity, increases.

A risk assessment can help determine:

* how severe a risk is
* whether existing control measures are effective
* what action you should take to control the risk, and
* how urgently the action needs to be taken

# Assessing risks

The information below can help you to assess the **severity** of the consequences and the **likelihood** of injury or illness occurring, and then to assess the **level of risk** for each hazard.

### Assessing severity

The severity of the consequences can be rated by the degree of injury or illness that could occur:

|  |  |  |  |
| --- | --- | --- | --- |
| Consequence | Description | Likelihood | Description |
| Insignificant | Nothing required | Rare | Only occurs in exceptional circumstances |
| Minor | Minor injury requiring first aid (ie, small cut or twisted ankle) | Unlikely | Does not happen often |
| Moderate | Injury requiring medical treatment (ie, sprained muscle) | Possible | May occur, but not often |
| Major | Serious injury – specialist medical treatment or hospital (ie, broken bone) | Likely | Occurs occasionally |
| Critical | Loss of life, permanent disability (ie, neck or spine injury | Almost Certain | A regular occurrence |

### Assessing likelihood

The likelihood of injury or illness occurring can be rated:

|  |  |  |
| --- | --- | --- |
| Assessed Risk Level | Risk Level | Actions |
| Low | If incident occurs, little likelihood of injury | Undertake with existing mitigations |
| Medium | If incident occurs, some chance of injury requiring first aid | Additional rules or considerations may be needed |
| High | If incident occurs likely that the injury would require medical treatment | Controls will need to be in place before undertaken |
| Extreme | If incident were to occur, it would be likely that death or permanent injury would result | Consider alternatives to the activity or additional significant safety measures required. |

### Assessing the level of risk

The level of risk will increase as the likelihood of injury or illness and its severity increases, as the risk rating table below shows. Once the risk for each hazard has been assessed, identify and put in place appropriate control measures, concentrating first on extreme and high risks.

#### Risk rating table:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Likelihood** | **Consequence** | | | | |
| **Insignificant** | **Minor** | **Moderate** | **Major** | **Critical** |
| Almost Certain | Medium | Medium | High | Extreme | Extreme |
| Likely | Low | Medium | High | High | Extreme |
| Possible | Low | Medium | High | High | High |
| Unlikely | Low | Low | Medium | Medium | High |
| Rare | Low | Low | Low | Medium | High |

# Risk register template

Refer to the above information to determine Likelihood, Consequence and Risk Rating. The content below will not necessarily reflect your own risk setting. **It is an example only.**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Risk description | Potential Harm | Consequence | Likelihood | Risk rating | Eliminate, isolate or minimise | Risk controls | Training or information required | Date checked |
| Exposure to Omicron variant of COVID-19 | For the majority of people it will be a mild to moderate illness that can be managed at home. Commonly, children have mild or no symptoms of COVID-19 with a short duration of illness.  The incidence of severe or fatal disease in children is significantly lower than in adults. | Minor to moderate – for majority | Likely | Medium | Minimise | * Icon    Description automatically generatedRegularly monitoring COVID-19 case numbers in the community * Staying away if unwell and getting tested * Monitoring for symptoms and asking those unwell to go home * Maintaining good ventilation in indoor spaces * Good hygiene and cleaning * Encouraging and supporting all staff and eligible students to get vaccinated including booster doses * Supporting those who choose to wear masks |  | xx/xx/22 |
| A very small proportion of the population are at risk of hospitalisation and for a very small proportion COVID-19 can lead to death. | Major to critical – for those at very high risk of severe illness | Rare | Medium - High | Minimise | For children with multiple chronic conditions and staff or children who have an [underlying medical condition](https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-information-specific-audiences/covid-19-higher-risk-people#positive) which puts them at higher risk from COVID-19, and regardless of their own vaccination status:   * Develop an individual plan to support safety onsite, and to reflect the current level of risk * Regularly review the plan, working with whānau to do so |
| Use of poorly ventilated spaces | Exposure to COVID-19 and other airborne illnesses | Minor to moderate – for majority  Major to critical – for those at very high risk of severe illness | Likely  Rare | Medium  Medium - High | Minimise  Minimise | See the [Te Mahau website](https://temahau.govt.nz/covid-19/advice-schools-and-kura/ventilation-schools) for further information and support, however depending on your facilities and context, your ventilation risk controls for your school could include:   * regularly review the school ventilation plan * ventilation is included as a specific item in health and safety briefings with all staff and the Board * staff know the signs that indicate a space may not be well-ventilated * fortnightly testing of all rooms including staff rooms and office spaces, using portable CO2 monitor – increase to weekly during periods of cold/wet/windy weather for harder to ventilate rooms * each room identified as harder to ventilate has a specific plan to manage risk including: * open doors and windows as much and for as long as practicable * for rooms where windows don’t open - refresh the air in the room during hourly breaks * where practicable minimise use of room for higher-risk activities (eg, physical activities, singing, kapa haka) * use portable air cleaner (if assessment indicates it is appropriate to do so) * where practicable, limit the number of people using the space (no over-crowding) * for cold/wet/windy weather days: * pre-heat spaces before start of day * partially open all windows by 5cm * increase indoor heating to compensate * for rooms with windows that don’t open – fully open all doors and evacuate the room every hour for 3 – 5 minutes to fully refresh/replace air in room |  |  |

# Monitor and review

Once the controls have been implemented, they must be monitored and reviewed regularly to ensure they are effective. The relevant school leader is expected to do this in consultation with workers. The regularity will depend on the risk rating.

The principal collates all risk registers on a regular basis for board reporting. The PCBU must consider what is reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters such as the likelihood of, and consequence of harm occurring, and the availability and suitability of ways in which to eliminate or minimise the risks.

## Review process

Your current health and safety plan is your starting point. You will already have a range of mitigations in place.

When identifying risks and understanding your legal duties, are there measures in place that, as far as reasonably practicable, provide for the health and safety of workers and do not put people at risk from the work that is being carried out at schools and kura?

[WorkSafe’s advice](https://www.worksafe.govt.nz/managing-health-and-safety/managing-risks/) is that, in deciding what controls to implement, employers should first consider the controls that are least intrusive to employees before requiring higher level measures. For example in relation to COVID-19, requiring vaccination may be a consideration however few workplaces will be able to justify an employer vaccination requirement for health and safety or public health reasons. For those employers who can, this would likely only be for specific roles.

You should undertake an assessment in consultation with your workers, their representatives, and any other relevant parties such as parents and those in your wider school community. If a role is currently staffed and may be impacted, it is particularly important that any assessment should be undertaken in consultation with that staff member.

Further information and support

* [Health, safety and wellbeing – Education in New Zealand](https://www.education.govt.nz/school/health-safety-and-wellbeing/)
* [Ventilation in schools | Te Mahau](https://temahau.govt.nz/covid-19/advice-schools-and-kura/ventilation-schools)
* [COVID H&S response](https://temahau.govt.nz/covid-19/advice-schools-and-kura/covid-19-health-and-safety-response)
* [Reviewing health and safety in schools in COVID times - NZSTA Vimeo](https://vimeo.com/696334411)

Please contact your regional Te Mahau contact, the New Zealand School Trustees Association or Te Rūnanga Nui if you require further support to manage risk and health and safety in your school.

* [Local Ministry offices – Education in New Zealand](https://www.education.govt.nz/our-work/contact-us/regional-ministry-contacts/)
* [New Zealand School Trustees Association](https://www.nzsta.org.nz/)

[Te Rūnanga nui o ngā Kura Kaupapa Māori o Aotearoa](https://runanga.co.nz/)

# Risk assessment following an emergency event

As part of your risk assessment approach to managing your school, particularly following an emergency event or widespread infectious illnesses in your school, you will need to determine if you have sufficient staffing to ensure key functions can continue to operate.

If ‘no’, you will need to take action, which at a very worst-case scenario may require the school closing onsite and moving to learning from home.

|  |  |  |
| --- | --- | --- |
| Critical functions | ü / û | Notes / Actions needed |
| Non-teaching staff to manage school operations onsite – eg, reception, payroll, facilities management, finances |  |  |
| First-aid staff |  |  |
| Emergency management capability onsite |  |  |
| Cleaning staff to meet minimum health and safety requirements |  |  |
| IT capability to support onsite / offsite learning |  |  |
| Qualified teachers to support the numbers of learners onsite |  |  |
| Able to support children with additional learning needs onsite |  |  |
| Specialist facilities management staff eg - drinking water supply, specialist pool maintenance |  |  |
| [add other critical functions identified in your school and business continuity plan] |  |  |
| [add other critical functions identified in your school and business continuity plan] |  |  |
| [add other critical functions identified in your school and business continuity plan] |  |  |

# Risk assessment and COVID-19

Each school has a unique community and context that will be taken into account when planning for and responding to COVID-19 cases in the community.

Any risk assessment will need to reflect your own school context including:

* Volume of cases in your region / community
* Trends in case numbers (upwards or downwards)
* Level of immunity and vaccination in your community
* Knowing which individuals may be at higher risk from COVID-19

You may determine there is a greater level of risk for some or many of your community. For example you are in an area with lower vaccination rates, you have a high proportion of staff over 60 years of age, or your community has a high proportion of the population who are at higher risk from COVID-19 such as having an underlying health condition.

If you are considering policies that go beyond the recommended public health measures – for example, you may be thinking about requiring face masks indoors – you will need to explain why the additional mitigations are proportionate to the situation and level of risk.

It is essential to engage your staff and it is desirable to consult with your school community when your board is developing or reviewing health and safety policies.

[Community consultation – NZSTA](https://www.nzsta.org.nz/assets/Uploads/Governance-Support-Resources-Community-consultation.pdf)

If you do choose to implement additional measures, you will also need to specify the consequences for a student or employee not following those measures.

Determining community vaccination status:

* The Unite Against COVID-19 website has a map showing vaccination rates around New Zealand - [Map of COVID-19 vaccination rates in New Zealand](https://covid19.govt.nz/news-and-data/covid-19-vaccination-rates-around-new-zealand/), to help inform your planning. You can drill down to the equivalent of a suburb (Statistical Area 2) and by ages 5 – 11 and 12+.
* This data is also published in spreadsheet form by the Ministry of Health each week - [COVID-19: Vaccine data | Ministry of Health NZ](https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-data-and-statistics/covid-19-vaccine-data#download). Open the first spreadsheet “COVID-19 vaccination data through xx xxx 2022”. Go to the tabs ‘TLA’ and ‘SA2 All Ethnicities’ or ‘SA2 Māori and Pacific Peoples’.

## Those at higher risk

Omicron is a very infectious variant of COVID-19. Although milder than Delta, Omicron is not a mild illness, and we continue to see cases and hospitalisations. Those who are vaccinated and boosted are less likely to get COVID-19 than someone who is not vaccinated, however both vaccinated and unvaccinated people can get COVID-19 and can pass it on. Commonly, children have mild or no symptoms of COVID-19 with a short duration of illness. The incidence of severe or fatal disease in children is significantly lower than in adults.

The consequences of exposure to COVID-19 can however be extremely serious for a very small proportion of individuals exposed to COVID-19. You will know who those individuals are in your school and will already have a plan in place to support their attendance onsite as appropriate. Advice from their GP or other health professional can support that plan.

## Potential risks and issues

| Potential risk / issue | Considerations |
| --- | --- |
| Learners with higher levels of disadvantage | * Consider prioritising their attendance in situations where you may need to split learning onsite and offsite |
| Learners at higher risk of severe illness especially if not fully vaccinated | * Consider further health measures that might be introduced to support onsite attendance * Encourage whānau to seek medical advice regarding attendance onsite * Plan in advance for their learning from home if needed |
| Teaching and support staff at higher risk of severe illness especially if not fully vaccinated | * Encourage staff to get their booster vaccination as soon as they become eligible * Consider further health measures that might be introduced to support onsite attendance * Encourage staff member to seek medical advice regarding attendance onsite |
| Students with additional learning needs | * Consider prioritising their attendance onsite in situations where you may need to split learning on and offsite * Do they have access to appropriate resources and supports at home? |
| Indoor environments in which it is challenging to maintain good ventilation | * Consider adjusting the behavioural or property ventilation strategies and solutions being adopted in those spaces * Encourage regular refresh breaks, where all windows and doors are fully opened for a short time to air out the space * Consider changing the occupation and/or activity levels * Utilise the [pre-winter checklist](https://temahau-live-storagestack-pv-assetstorages3bucket-4pgakoc5n3r5.s3.amazonaws.com/s3fs-public/2022-04/Pre%20winter%20checklist.pdf?VersionId=UuwZ6_4NcQeaUJe3xsKm2pJ3EC_irsDG) on the Te Mahau website |
| Community cautious about sending children to school when there is higher levels of community transmission | * Maintain communications and reassurances about the health measures you have in place to reduce risk * Prepare to support some form of learning from home, wherever possible * How can you keep connected with these children/students? |
| Very high proportion of staff and student absence (eg, confirmed cases) | * Prioritise attendance onsite for most vulnerable learners and those who don’t have an appropriate care option at home * Limit staff onsite to only those necessary to safely support children/students who are attending onsite |

## Health measures

There are a range of public health measures you can implement to reduce the risk of infectious illnesses, including COVID-19.

The measures used are likely to vary depending on the level of risk for your community. For example, increased levels of COVID-19 cases coupled with winter illnesses may see your mask policy change to require masks in some indoor settings.

The following table can be used to review your existing measures for managing infectious illness, including COVID-19, and consider whether further measures may need to be added where infection risk is higher.

|  |  |  |
| --- | --- | --- |
| Health measures | ✓/🗶 | Notes / Actions needed |
| Emphasise good hand hygiene and cough/sneeze etiquette |  |  |
| Increased cleaning and disinfecting high touch surfaces |  |  |
| Vigilant monitoring for symptoms and staying away if sick |  |  |
| Good ventilation – using a range of measures |  |  |
| Use of face masks |  |  |
| Physical distancing between classroom groups – 1 metre when indoors, wherever practicable |  |  |
| Large groups of staff or students meeting should be held outdoors whenever possible |  |  |
| Reduce non-essential visitors onsite |  |  |
| Teaching across different groups minimised as much as possible. |  |  |
| Change furniture layout to increase space between children/students |  |  |
| If onsite delivery is not possible for all learners - prioritise attendance for most vulnerable learners including new entrants in primary settings |  |  |
| Issue devices / resources in readiness for need to have some children/young people learn from home |  |  |
| Consider if meetings can be moved to online rather than face to face |  |  |
| [Other measure] |  |  |
| [Other measure] |  |  |
| [Other measure] |  |  |