**Risk Assessment Procedure**

**Scope:**

This procedure is specifically aimed at identifying the hazards present in the workplace or arising out of work activities and evaluating the risks involved taking into account existing precautions and their effectiveness. Assessments will take into account the risks to staff, visitors and the environment working within, attending or visiting the workplace.

This procedure will also cover how the Recyclus group will comply with environmental aspects and impacts documented and reviewed via the aspects and impacts register.

ISO 9001, 14001 and 45001 standards will used to manage risk and expectations in support of the Heath and safety of all interested parties and the supporting environment.

**Interested Parties**

All employees of the Recylclus group and visitors/contractors

**References:**

ISO 9001, 14001, 45001

Aspects and impacts register

Environment Protection act

Recyclus ISO Management system – Microsoft SharePoint

HSE

Gov UK

**The law**

The law states that a risk assessment must be 'suitable and sufficient', ie it should show that:

* a proper check was made
* you asked who might be affected
* you dealt with all the obvious significant risks, taking into account the number of people who could be involved
* the precautions are reasonable, and the remaining risk is low
* you involved your workers or their representatives in the process

The level of detail in a risk assessment should be proportionate to the risk and appropriate to the nature of the work. Insignificant risks can usually be ignored, as can risks arising from routine activities associated with life in general, unless the work activity compounds or significantly alters those risks.

Your risk assessment should only include what you could reasonably be expected to know - you are not expected to anticipate unforeseeable risk.

**The Principles of Risk Assessment**

**Health and Safety**

The objective of carrying out risk assessments is to reduce, in so far as is reasonably practicable, the significant risks associated with hazards in work tasks and workplaces to tolerable levels in terms of potential human suffering, legal requirements and economic effects on the organisation.

A risk assessment should identify how risks arise and how they impact on those affected. This information is required to make decisions on how to manage those risks so that the decisions are made in an informed, rational and structured manner and the action taken is proportionate.

When conducting a risk assessment existing control measures or treatments should be taken into consideration providing the suitability and effectiveness of the control measure is also assessed. The

Regulations require that an assessment should be “suitable and sufficient” practice, therefore, a risk assessment should:

* Identify the risks arising from or in connection with work
* Have a level of detail proportionate to the risks identified
* Identify the length of time for which it remains valid
* Call on examples of good practice from within the field of operation
* Be practical and take into account the views of employees, safety representatives and managers.

Risk management should be about practical steps to protect people, not paperwork for its own sake”

**Definitions**

For the purpose of this document the company defines:

**Accident** – An event that results in injury or ill health

**Adverse Incident** - Any untoward or unexpected event which interferes with the orderly progress of day to day activity and which results in, or could have resulted in:

• Harm to an individual or individuals

• Damage to or loss of property including buildings, equipment, vehicles and materials

**Consequence** – The outcome of an event, being loss, injury, disadvantage or gain in respect of the physical, emotional, financial, social or credibility status of the individual or organisation

**Harm** – Injury (physical or psychological), disease, disability or death

**Hazard** – A source of potential harm or a situation with the potential to cause harm

**Likelihood** - Probability of an event occurring, wherever possible based upon the frequency of previous occurrences

**Monitor** – To check, supervise, observe critically or record the progress of an activity, action or system on a regular basis in order to identify change

**Near Miss** - An incident where there was the potential for harm, loss or damage, and which did not actually result in an adverse outcome, but where there is the possibility of recurrence if preventative action is not taken

**Risk** - The chance of something happening that will impact on the organisation‟s ability to achieve its objectives

**Risk Control Measure** - An action undertaken to minimise risk to an acceptable level either by reducing the likelihood of an adverse event or the severity of its consequences or both

**Risk Treatment** – Selection and implementation of appropriate options and action plans for dealing with risk

**Significant Adverse Event/Incident:** An unexpected or avoidable event that could have resulted, or did result in, unnecessary serious harm or death of a, staff member, visitors or members of the public . Such events are likely to generate legal, media and/or other interest and may result in loss of the company’s assets and/or reputation

**Significant Risk** – One in which staff or facilities may be subject to legal, media or other interest and where, if not managed effectively, the risk could result in loss of life or significant loss of the organisation‟s assets or reputation.

A full glossary of terms relating to risk management can be found in Appendix J of the Risk Management Strategy referred to above.

**Environmental Risk Management**

An organisation’s activities, products and services that interact with the environment are referred to as “aspects”, which may have a negative or positive impact on the environment. Typically, aspects might include emissions to air, discharges to water and waste arisings, which in turn may generate environmental and health impacts such as global warming, water pollution or contaminated land.

All activities generate impacts. Some, such as those of an office-based service, may have relatively minor environmental impacts, such as less waste materials and lower energy consumption linked to air pollution. Whereas some heavy industrial aspects such as processes that cause emissions to air and discharges to water may have significant environmental impacts.

Managing environmental aspects and impacts is arguably the most important component of an environment management system. Through a team based risk management process Recyclus will identify environmental aspects and related impacts and provides useful methods for determining relative significance in terms of risks to the environment. A register will be complied and reviewed regularly of significant aspects and impacts.

Requirements of ISO 14001

[ISO 14001](https://app.croneri.co.uk/topics/ems-standards/quickfacts) requires organisations to use a systematic approach to determine its aspects and impacts, by having documented procedures which:

[determine](https://app.croneri.co.uk/topics/environmental-aspects-and-impacts/indepth#DCAM-932385) the environmental aspects of its products, services and activities, taking into account current and planned activities, covering the aspects that it can both control and influence

determine the environmental [impacts of each aspect](https://app.croneri.co.uk/topics/environmental-aspects-and-impacts/indepth#DCAM-932386)

assess the [significance](https://app.croneri.co.uk/topics/environmental-aspects-and-impacts/indepth#DCAM-932388) of these aspects and impacts.

An organisation must also consider:

* aspects which are under direct management control
* aspects which are indirect and do not fall under management control
* aspects which can be [influenced](https://app.croneri.co.uk/topics/environmental-aspects-and-impacts/indepth#DCAM-932380), if not controlled
* past, current and future aspects
* actual and potential aspects

linkages between environmental aspects and legal compliance or other requirements

**Regulatory Tools for Environmental Risk Assessment**

The Environmental Agency’s (EA) [environmental permit risk assessment](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit) guide explains how to do a permit-related risk assessment. Defra has also published a scheme for local authorities for use on industrial processes regulated under the UK [environmental permitting regulations](https://app.croneri.co.uk/topics/environmental-permitting-programme/quickfacts).

Both these methodologies assess the sensitivity of the receiving environment, the environmental hazards of the installation being considered, and how operators manage and control these risks.

The Recyclus Group will actively support the Environment Protection act through the compliance of ISO 9001/14001 accreditation process.

**Aspects and Impacts**

Recyclus have identified environmental aspects of its activities(process) and products that we can control and those that we can influence, and our associated environmental impacts, considering a life cycle perspective. (Circular economy)

When determining environmental aspects, Recyclus shall take into account:

a) change, including planned or new developments, and new or modified activities, and products

b) abnormal conditions and reasonably foreseeable emergency situations.

Recyclus shall determine those aspects that have or can have a significant environmental

impact, i.e. significant environmental aspects, by using established criteria.

Our Aspects and impact register located through our management system reviews risks all aspects (including significant) and impacts of the organisation and including the relevant activity, interested parties, controls and management review process.

**Risks and Opportunities**

When planning for the environmental, safety and quality management system, Recyclus shall

the risks and opportunities, related to its environmental aspects, Health and Safety matters and customer expectations. Our overall objective is to:

* reduce undesired effects, including the potential for external environmental conditions

to affect the organization.

* identify hazards and reduce risk to interested parties
* consistently meet customer and supply chain requirements.
* achieve continual improvement.

Within the scope of the environmental and Health and Safety management system Recyclus shall determine potential emergency situations, including those that can have an environmental impact.

**Monitoring and Review**

Overall responsibility for maintaining a sound system of internal control lies with the Chief Executive on behalf of the company. Via the committee and line management structures outlined in the Risk Management Strategy, the Chief Executive ensures that these procedures are reviewed annually and in the light of:

a) Any significant changes in working practices

b) Any changes in statutory legislation

c) An incident occurring that requires improvement in practice.

**Compliance** All staff must comply with the requirements of the company’s Safety and Risk Management strategies, policies and procedures. As stated in the Risk Management Strategy, the company have endorsed an approach to risk management which aims to promote responsible risk-taking within “a fair and just system where people are held to account for their behaviour, without being unduly blamed”. Staff must be aware, however, that they have a statutory duty under the Health and Safety at Work etc Act 1974 to take reasonable care of not only their own health and safety but also that of as well as a other people who may be affected by their “acts or omissions at work” duty to co-operate with their employer. As a consequence they must notify all hazards, defects, accidents, adverse events and near misses to their Head of Department or immediate line manager and ensure that these are recorded appropriately via the electronic risk management system.

**Risk Assessment**

A risk assessment is simply a careful examination of what, in your work, could cause harm to people, so that you can weigh up whether you have taken enough precautions or should do more to prevent harm. It is a simple, practical but systematic thought process involving five steps:

1. Identify the hazards
2. Decide who could be harmed
3. Evaluate the risks and decide on precautions (control measures)
4. Record your findings and implement them
5. Review your assessment and update if necessary. These „Five Steps to Risk Assessment‟ have been developed by the Health and Safety Executive [HSE]

**Conducting a Risk Assessment**

When thinking about your risk assessment, remember:

A **hazard** is something with the potential to cause harm to:

* People
* The organisation (finance and reputation)
* The environment (pollution and inefficient use of resources)

A **risk** is the chance, high or low, that somebody could be harmed by these and other hazards, together with an indication of how serious the harm could be.

The risk assessment process involves analysis of the risk using a Risk Assessment Tool/Scoring Matrix, which by mapping the likelihood (the probability or frequency of a consequence occurring) against the consequence (the outcome or impact) allows a value to be assigned to that risk.

Assessment of risks needs to be based on the best available evidence and, where evidence is lacking, on the best available advice. This means that, via your line manager, you might have to seek appropriate and relevant technical help from others within the organisation

**Step 1: Identify the hazards**

There are three main areas that need to be covered when identifying hazards:

1) **Practice –** look at the work activities and review any procedures/safe systems of work that are already in place. Identify what in the work activity could be reasonably expected to cause harm. Are any of the work activities carried out in unusual places such as at height or at night; does the activity involve repetitive motions etc.? Consult with those who are carrying out the work activity - they may have identified hazards that are not immediately obvious.

**2) Equipment –** as part of the work activity, consider what equipment or substances are used. Identify the potential/actual hazards associated with the equipment/substances as they are being used in the workplace. When in use does the equipment produce excessive noise/vibration; are there any emissions? Manufacturer‟s instructions or data sheets can also help to spot hazards.

**3) Environment –** are the conditions of the local environment satisfactory for the work activities being performed?

There are two main ways that hazard spotting can be completed. One is to analyse the various tasks undertaken by postholders and another is to produce a list of relevant topics and conduct risk assessments for each topic

**Step 2: Decide who could be harmed**

Identify which personnel are involved in the activity and what their roles are. Special consideration must be given to the following groups:-

* New and expectant mothers
* Young people (under 18)
* Night workers
* Lone workers
* Workers with disabilities

Additionally, you must consider anyone else who could potentially be affected by the activity or circumstances e.g.

* Visitors/members of the public
* Contractors
* Delivery personnel
* Neighbouring facilities and people

Accident statistics and ill-health records can also be helpful with hazard spotting and/or identifying particular groups of people at risk.

Once you have identified who is at risk, consider how they may be exposed to the relevant hazards that have been identified. Identify under what conditions exposure occurs e.g. routine or non-routine; deviation from normal exposure or an emergency situation such as spillage of hazardous substance.

**Step 3 Evaluate the risks and decide on precautions (control measures)**

Having identified the hazards and who might be affected, you then have to decide what to do about them. The law does not expect you to eliminate all risk, but you are required to protect people as far as is „reasonably practicable‟. This requirement underpins almost all of the general duties under the Health and Safety at Work etc Act 1974 and allows a balance to be struck between the cost of the action proposed (in terms of money, time and inconvenience) and the degree of risk associated with the situation being considered.

First, look at what you‟re already doing, think about what controls you have in place and how the work is organised. Then compare this with good practice and see if there‟s more you should be doing to bring yourself up to standard. In asking yourself this, consider:

 Can I get rid of the hazard altogether?

 If not, how can I control the risks so that harm is unlikely?

Examples of common control measures include:

i. Specialist equipment

ii. Safety signs and signals

iii. Policies and procedures

iv. Safe systems of work – including Permits to Work

v. Training, instruction and supervision

vi. Health surveillance.

If the existing measures are not adequate or there are no control measures then means of reducing the risk must be identified. Starting with all the extreme or high risks, the following sequence should be applied:

a) **Eliminate** – can the risk be removed. Do we need to carry out this procedure? Can it be done in a different way that eliminates or reduces the risk?

b) **Substitute** – can a different product or way of doing the task, which is less hazardous, be employed instead?

c) **Contain/guard** – is there any way the hazard can be contained e.g. putting a noisy piece of equipment in an acoustic box. Do guards need to be introduced (physical, electronic or distance) e.g. fitting a hazardous piece of equipment with an electronic guard which will prevent the equipment working if the guard is compromised?

d) **Remove employee from risk** – is it possible to segregate the employee from the hazard? E.g. have the hazard in one room and the employee operating the process from a panel in another room or by providing screens etc.

e) **Reduce the employees exposure to the hazard** – This can be done by changing work methods and/or patterns e.g. reducing repetition, ensuring adequate rest breaks, increasing the number of workers, introducing job rotation

f) **Utilise Personal Protective Equipment [PPE]** – this should always be considered as a last resort to control any residual risk that cannot be eliminated by any of the above methods. It will include the provision of facemasks, gloves, aprons, steel toe-capped shoes, hard hats etc.

Information, instruction, training and supervision should also be considered. Often good training and information will provide satisfactory control for minor risks but remember that levels of supervision should be reviewed where young/inexperienced people are employed or where staff turnover is high.

**Step 4: Record your findings and implement them**

All risk assessments are recorded directly onto the electronic risk management system. Any member of staff can document a risk using the appropriate link on the home page of the intranet

Clicking on the link takes you directly to a Risk Assessment Form which allows you to record:

* Risk summary
* Description of the risk
* Risk grade
* Controls in place
* Review date

Additional fields are available to managers and Heads of Departments to manage their risks via their Teams LOGIN link, including:

* Potential impact of risk
* Level of risk e.g. departmental/directorate/corporate
* Initial, current and target risk grade
* Closed date (for risks that are no longer applicable).

As noted above, the Risk Assessment Form includes a Risk Assessment Tool/Scoring Matrix to enable you to record:

i. What you feel is the likelihood of an incident occurring

ii. What impact such an incident would have.

Using the descriptions provided in Tables 1 and 2 (**Appendix A**) will help you do this and allow you to identify the value(s) on the Risk Matrix/Matrices which are most appropriate.

Once you have completed the risk assessment, you must act on the findings. This means putting the results of your risk assessment into practice – which is what contributes to a safer, healthier workplace, and, ultimately, the delivery of organisational objectives. Writing down the results of your risk assessment and sharing them with staff encourages you to do this.

As indicated at the beginning of these procedures, by law, risk assessments must be suitable and sufficient. To demonstrate this, the Risk Assessment Form needs to show that:

A proper check was made

* You asked who might be affected
* You dealt with all the significant hazards, taking into account the number of people who could be involved
* The precautions are reasonable and the remaining risk is low; and
* You involved your staff or their representatives in the process14.

**Step 5: Review your assessment and update if necessary**

* Risks must be reviewed regularly. If further actions have been required then the review will help to establish whether the action has been taken and if so how much progress has been made. The Risk Assessment Form incorporates a Review Date section. The Review Date is the date when you will next look at the risk and control measures.
* If no further actions are required, then the risk assessment should be reviewed after 12 months. Where moderate or minor risks are identified, then a six-monthly review is normally sufficient. A significant, ongoing risk will require close monitoring and be reviewed at intervals of not more than three months.
* Few workplaces stay the same and if there are changes to ways of working and/or new equipment or substances introduced then risk assessments must also be reviewed at these times to ensure that any new hazards or changes to previous risks are identified

**Risk Registers**

Each department’s log of all the risks recorded on the Teams system is referred to as a Risk Register. Each Manager/Head of Department is responsible for maintaining this register, ensuring the risk information it contains is up-to-date and review dates have not expired.

* Heads of Departments must identify any high or very high level risks deemed impossible or impractical to manage at a departmental or Management Team level or any risk that could adversely affect achievement of the company’s objectives or present a large loss to the organisation and bring these to the immediate attention of the relevant Director. Such risks will then be submitted by that a senior management to be considered for inclusion in the Corporate Risk Register .

**The Risk Assessment Matrix**

A risk matrix is **a matrix that is used during risk assessment to define the level of risk by considering the category of probability or likelihood against the category of consequence severity**. This is a simple mechanism to increase visibility of risks and assist management decision making.

The risk analysis is not something to take lightly. There are certain steps that you need to follow in order to do effective management of risks. When an organization has pitched all the right risks, the next step is going to carefully evaluate them.

A risk assessment matrix focuses a lot of chances and consequences as the main focus. But depending on the organization, we are talking about you can encounter terms like “vulnerability” or “speed of onset”.

The 5x5 matrix template provides additional scaling options; this template is ideal for organizations that need more granular insight into each risk. After determining the values for severity and likelihood, use the grid to determine the priority of the risks.

Treemap chart

Description automatically generated

In the event of an environmental issue caused by a failure in the controls used in the process, if the Severity rating in the risk assessment has been determined as category 4 or 5, the not only does the plant need to be closed, but all further deliveries of feed material need to be stopped until a full review has taken place by the senior management and the Contingency Plan becomes operational.

**All Risk Assessments will be reviewed annually.**