

01 September 2021 - Premises Risk Assessment - Preventing COVID-19 Spread in the School Environment

<b>Academy / School</b>	Lime Academy Hornbeam	<b>Assessment No.</b>	1.11
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<b>Site</b>	William Morris Campus	<b>Location</b>	London Borough of Waltham Forest		
<b>Subject of Assessment</b>	Operational risk assessment for 1 September 2021				
<b>Assessed by</b>	Ben Hawes Headteacher	<b>Date</b>	01 September 2021	<b>Review date</b>	20.05.22
<b>Details of workplace/activity</b>	Managing the school site. Preventing COVID-19 Spread in the school environment Managing increasing pupil and staff numbers	<b>Persons Affected</b> <i>(Who may be harmed)</i>			
		Staff, pupils, parent/ carers and visitors			

No	Hazard / Hazardous Event (what can go wrong)	People at Risk	What is currently being done to control the hazard / hazardous event	Likelihood Impact Risk Score	Further Action (required to lower risk)
<b>Prevention of Infection</b>					
1.	Spread of COVID-19 Coronavirus in the Academy	Staff, pupils, parents / carers and visitors	<p>The Academy will follow the government advice on <a href="#">Emergency planning and response for education, childcare, and children’s social care settings</a> where reasonably practicable</p> <ul style="list-style-type: none"> <li>• Minimise contact with individuals who are unwell by regular contact with parents and staff; identify those who have coronavirus (COVID-19 / cold / flu symptoms and advise them not to attend school</li> <li>• Ensure that pupils, staff and other adults do not come into the school if they have <a href="#">symptoms of a respiratory infection including COVID-19</a> , or have tested positive in the last 10 days.</li> <li>• If anyone in the school becomes unwell with continuous cough; high temperature, fever or chills; loss of, or changing in, your normal sense of taste or smell; shortness of breath; unexplained tiredness, lack of energy; muscle aches or pains that are not due to exercise; not wanting to eat or not feeling hungry; headache that is unusual or longer lasting than usual; sore throat, stuffy or runny nose; diarrhoea, feeling sick or being sick.</li> <li>• <a href="#">The guidance for people with symptoms of respiratory infection including COVID-19</a> states that if someone is feeling unwell with these symptoms and do not have access to a free test, they should stay at home, get plenty of rest and drink water to keep hydrated. The advice recommends taking such medications as paracetamol to help with the symptoms</li> <li>• Any child awaiting collection, will be moved to the Medical Room with external ventilation (open window) where they can be isolated behind a closed door, depending on the age and needs of the child, with appropriate adult supervision if required.</li> <li>• Any members of staff who have helped someone with symptoms and any pupils who have been in close contact with them do not need to go home to self-isolate unless they develop symptoms themselves or</li> </ul>	LOW	

			<p>if the symptomatic person subsequently tests positive, or they have been requested to do so by <u>NHS Test &amp; Trace</u>.</p> <ul style="list-style-type: none"> <li>• Pupils, staff and other adults must wash their hands thoroughly for 20 seconds with soap and running water or use hand sanitiser after any contact with someone who is unwell.</li> <li>• First Aid may be administered in close proximity and where reasonably practicable make available, a fluid-repellent surgical mask, disposable gloves, eye protection, apron or other suitable covering and covering for injured person. First Aiders should pay particular attention to sanitation measures immediately afterwards including washing hands.</li> </ul>		
2.	Unvaccinated member of staff is close contact of a confirmed case	Member of staff	<ul style="list-style-type: none"> <li>• On being identified as a close contact of a confirmed case, the employee must immediately inform their manager and go home to self-isolate for 10 days, unless the employees is unable to be vaccinated due to medical reasons.</li> <li>• The employee will be encouraged to get a PCR test.</li> </ul>	LOW	
3.	Hygiene: Poor hand hygiene spreads Covid-19	Pupils, staff and other adults, Contractors Visitors Site Team	<ul style="list-style-type: none"> <li>• An assessment of hand hygiene needs has been completed and there are adequate hand hygiene and handwashing facilities available for staff, pupils and visitors</li> <li>• Staff and pupils must clean their hands regularly, including when they arrive at school, when they return from breaks, when they change rooms and before and after eating. Regular and thorough hand cleaning is going to be needed for the foreseeable future.</li> <li>• Staff will support younger children and those with complex needs are helped to get this right, and all pupils understand that this is now part of how school operates.</li> <li>• Pupils instructed and supervised about the risks of ingesting hand sanitiser. Small children and those with complex needs are continued to help to clean their hands properly. Skin friendly skin cleaning wipes can be used as an alternative.</li> <li>• Staff and pupils have been informed about <u>good hand hygiene technique</u> from the NHS.</li> </ul>	LOW	
4.	Poor respiratory hygiene spreads Covid-19, including	Pupils, staff and other adults,	<ul style="list-style-type: none"> <li>• 'Catch it, Bin it, Kill it' approach is essential, so the school has enough tissues and bins available in the school to support pupils and staff to follow this routine.</li> </ul>	LOW	

	not wearing face coverings	Contractors Visitors Site Team	<ul style="list-style-type: none"> <li>• Staff will support younger children and those with complex needs to get this right, and all pupils understand that this is now part of how the school operates.</li> <li>• Face coverings are now recommended to be used because of the Omicron Variant: <ul style="list-style-type: none"> <li>○ staff and pupils to wear face coverings in communal indoor areas</li> </ul> </li> <li>• Special Schools and Alternative Provision will consider what arrangements work best for their wider school community The Government guidance on face coverings in <a href="#">Special schools and other specialist settings: coronavirus (Covid-19)</a> will be followed, generally in communal areas.</li> </ul>		
5.	Poor levels of cleanliness spread Covid-19	Pupils, staff and other adults, Contractors Visitors Site Team	<ul style="list-style-type: none"> <li>• The government guidance for <a href="#">Living Safely with respiratory infections, including COVID-19</a></li> <li>• A cleaning schedule is in place and includes: <ul style="list-style-type: none"> <li>○ more frequent cleaning of rooms / shared areas that are used by different groups</li> <li>○ frequently touched surfaces being cleaned more often than normal and at least twice per day, with one period being at the start or end of the day.</li> </ul> </li> <li>• Hand dryers and/or paper hand towels may be used</li> <li>• Lidded waste bins will be placed in strategic positions, both inside and outside the building so that waste materials can be managed safely</li> <li>• Bins will be emptied daily or more regularly if required</li> <li>• Hazardous waste will be double bagged following government guidance</li> </ul>	LOW	
6.	Use of equipment and cleaning arrangements	Pupils, staff and other adults, Contractors Visitors Site Team	<ul style="list-style-type: none"> <li>• Individual and very frequently used equipment, such as pencils and pens, are not shared. Classroom based resources, such as books and games, shared within the group are regularly cleaned, along with all commonly touched surfaces</li> <li>• Shared resources, e.g. sports, art, music and science equipment and cases, are cleaned regularly</li> <li>• Pupils have been advised to limit the equipment they bring into school each day, to essentials such as a bag lunch boxes, hats, coats, books, stationery and mobile phones.</li> <li>• Drinking fountains - pupils/staff should use their own water bottle or cup and fill this up at the fountain, rather than drink directly from them. If the pupils or staff do not have containers of their own the school should supply some so individuals can keep well hydrated.</li> </ul>	LOW	

7	Poor social distancing spreads Covid-19	Pupils, staff and other adults, Contractors Visitors Site Team	<ul style="list-style-type: none"> <li>• Where reasonably practicable, teachers at schools maintain a social distance from the pupils, staying at the front of the class, and away from their colleagues where possible</li> <li>• Staff will continue to keep meetings short in well ventilated spaces, including the staffroom</li> <li>• Should a Covid-19 outbreak occur in the school, will follow the controls in row 10 below, which may require a return to pupil/group segregation (bubbles) for an appropriate period of time.</li> </ul>	LOW	
8	Lack of Personal Protective Equipment spreads Covid-19	Staff	<ul style="list-style-type: none"> <li>• The majority of staff will not require PPE beyond what they would normally need for their work. PPE is only needed where: <ul style="list-style-type: none"> <li>○ an individual child or young person becomes ill with coronavirus (COVID-19) symptoms while at schools, and only then if a distance of 2 metres cannot be maintained</li> <li>○ a child or young person already has routine intimate care needs that involves the use of PPE, in which case the same type of PPE should continue to be used</li> </ul> </li> </ul>	LOW	
9.	Occupied spaces are not well ventilated or are too cold	Pupils, staff and other adults, Contractors Visitors Site Team	<ul style="list-style-type: none"> <li>• Rooms are aired as much as possible by keeping windows open to the outside for at least 10 minutes per hour; where practicable windows are kept slightly open when the school is open. Windows and doors to the outside are opened at break-times and lunch-times, where appropriate in relation to the needs of the learners. Where this impacts on thermal comfort staff and pupils will be reminded to wear warm or extra clothing; schools will be flexible with uniform requirements.</li> </ul> <p>To maintain a comfortable temperature:</p> <ul style="list-style-type: none"> <li>• High level windows will be opened in preference to low level to reduce draughts</li> <li>• Where reasonable practicable ventilation will be increased when spaces are unoccupied, e.g. between classes, during break and lunch, and when a room is unused</li> <li>• Furniture has been re-arranged, where possible, to avoid direct draughts</li> <li>• The heating has been adjusted to maintain comfort levels in occupied spaces</li> <li>• The ventilation system has been checked against the <a href="#">CIBSE guidance</a>. Where necessary the maintenance company have carried out checks and provided guidance on the safe operation of the ventilation system</li> </ul>	LOW	

10	Spread of Covid-19 goes unchecked	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>• The school will engage fully with the local Public Health Team’s <u>Local Outbreak Control Plan</u>, the DfE <u>Contingency Framework &amp; Helpline</u>: 0800 046 8687, the London Coronavirus Response Centre: 03400 303 0450 and NHS Test &amp; Trace system, this is covered in the schools Outbreak Management Plan/Business Continuity Plan</li> <li>• Strengthen communication to encourage twice weekly testing at home for staff, consider increased frequency of testing. Support from Stay Safe Champions available.</li> <li>• Consider re-introducing face masks for staff in communal areas if they are not already in use.</li> <li>• Advise all staff, which an emphasis on those staff who are not fully vaccinated, to consider wearing face masks in communal areas</li> <li>• Access specialist Infection Prevention Control support if required. Implement one-off enhanced cleaning, focussing on touch points and shared equipment.</li> <li>• Improve ventilation indoors if possible and consider moving activities outdoors.</li> <li>• Consider limiting residential visits, open days, parental attendance and live performances in the school.</li> <li>• Attendance restriction may be required in certain situations where other measures haven’t been sufficient and should only be short-term.</li> </ul>	LOW	
11.	Staff or students are asymptomatic with Covid-19	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>• In the case of an outbreak in the school, the Academy as part of its COVID-19 Outbreak Management Plan, will take advice from PHE and the local authority on whether a testing centre is required to be set up on the premises. A separate risk assessment will detail the appropriate controls if this is required</li> </ul>	LOW	On-site testing not viable due to needs of pupils and appropriate consent
12.	Member of school community is clinically extremely vulnerable / clinically vulnerable and staff at an increased risk from Covid-19	Extremely clinically vulnerable person	<p>Clinically Extremely Vulnerable</p> <ul style="list-style-type: none"> <li>• The school has provided a Covid-19 safe work environment</li> <li>• Government is advising clinically extremely vulnerable people, as a minimum, to follow the same guidance as everyone else</li> <li>• However, a CEV who is at a higher risk of becoming seriously ill they were to catch COVID-19, may wish to think particularly carefully about additional precautions that might wish to continue to take and hold discussion with their Manager/employer. During periods of high or rising infection rates, anyone CEV will have a separate assessment carried out and additional controls regarding keeping a safe distance from others and the wearing of face coverings along with any other practicable controls will be put in place</li> </ul>	MEDIUM	Ongoing risk assessments are being reviewed for those children who are deemed as medically vulnerable

			<ul style="list-style-type: none"> <li>• Pregnant employees / pregnant pupils will be advised to discuss vaccinations with the GP. Current evidence suggests vaccination should still go ahead for the protection of both mother and unborn child</li> <li>• A separate Individual Health Risk Assessment has been carried out for those identifying themselves as at higher risk, in discussion with their head of service/line manager and should be reviewed in light of updates or changes</li> </ul>		
13	Pupils and staff at increased risk of mental ill-health	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>• The Department for Education is providing additional support for both pupil and staff wellbeing in the current situation. Information is available regarding <a href="#">extra mental health support for pupils and teachers</a> and the <a href="#">Wellbeing for Education grant</a>.</li> <li>• Other resources that may be used include <ul style="list-style-type: none"> <li>○ <a href="#">webinar</a> advising school staff how to support pupil and student mental wellbeing</li> <li>○ PHE support children and young people's mental health and wellbeing</li> <li>○ Advice on Being active from <a href="#">the Association for Physical Education, Youth Sport Trust &amp; Sport England</a></li> <li>○ PHE and the NHS <a href="#">Every Mind Matters</a> campaign to help take action to look after mental health and wellbeing</li> <li>○ A training module, <a href="#">teaching about mental wellbeing</a>, to improve teacher confidence in talking about and teaching mental health and wellbeing</li> <li>○ The <a href="#">Education Support Partnership</a> provides a free helpline for school staff and targeted support for mental health and wellbeing</li> <li>○ Local access to <a href="#">Kooth online mental health support</a> is available for secondary school aged children in Waltham Forest</li> </ul> </li> <li>• The school has an employee assistance provider with the following free phone number 0800 0305 182 and this has been promoted to all staff</li> <li>• Teachers may wish to access the free <a href="#">MindEd hub</a>, which includes materials on staff resilience, families and other resources</li> <li>• Schools will work with school nursing services, as leaders of the <a href="#">healthy child programme</a>, to support the health and wellbeing of pupils</li> <li>• Staff can access the <a href="#">Thrive App</a> on their mobile phone, search "Thrive Mental Wellbeing" in your app store, the access code is available from the Head/SBM, has been posted in the staff room</li> </ul>	MEDIUM	
14	Lack of staff resources increases risk from Covid-19	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>• Staff have been asked to work as flexibly as possible. Managers have discussed and agreed any changes before they have been put in place</li> </ul>	LOW	

			<ul style="list-style-type: none"> <li>The school has reviewed existing practices and has used the DfE's <a href="#">workload reduction toolkit</a></li> <li>Staff have been made aware of the DfE range of resources, including <a href="#">get help with remote education</a> to help address workload</li> <li>Reference will be made to the Education Endowment Foundation (EEF) guidance on <a href="#">making the best use of teaching assistants</a> to help primary and secondary schools</li> </ul>		
15	Peripatetic / supply staff increase risk of Covid-19	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>All peripatetic and supply staff have confirmed they are not suffering any Covid-19 symptoms (new, continuous cough or a high temperature, or a loss of, or change in, their normal sense of taste or smell) before arriving on site.</li> <li>The <a href="#">DfE guidance</a> will be followed, including <a href="#">keeping children safe in education</a></li> </ul>	LOW	
16	Pupil behaviour increased risk of Covid-19	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>The behaviour policy has been reviewed and updated to reflect the requirements of the changing Covid-19 pandemic</li> <li>Use of social stories to communicate additional rules to pupils</li> <li>Clear, reasonable and proportionate expectations of pupil behaviour should be communicated clearly</li> <li>The Senior Leadership team, Pastoral and Family Liaison Team to provide support to overcome barriers to attendance and increased incidents of poor behaviour resulting from a lack of regular attendance. <a href="#">The guidance on behaviour and discipline in schools</a> will be followed.</li> <li>SLT, Teaching, pastoral and family liaison team to identify pupils in need of additional support with social, emotional and mental health concerns and work with local services</li> <li>Where pupils have a Behaviour Risk Assessments this will be updated and guidelines for physical intervention will be put in place to ensure a duty of care for the pupil</li> </ul>	LOW	
17	Catering staff increase the risk of Covid-19	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>The catering provider has confirmed compliance with existing food hygiene standards. Staff will adhere to the <a href="#">Food Standards Agency Safe Methods Checklist</a> for personal hygiene and fitness to work practices.</li> </ul>	LOW	
18	Building not maintained/used without maintenance undertaken	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>All the usual contractor checks are undertaken to make the school safe, including managing the risks of Legionnaires' disease. The HSE guidance has been followed <a href="#">Legionella risks during the coronavirus outbreak</a>.</li> </ul>	LOW	



19	Contractor / Providers visiting site increase risk of Covid-19	Pupils, staff and other adults Contractors Site Team	<ul style="list-style-type: none"> <li>Contractor/Provider has confirmed they are not suffering any Covid-19 symptoms (new, continuous cough or a high temperature, or a loss of, or change in, their normal sense of taste or smell) before arriving on site and provides evidence of a negative Lateral Flow Test</li> <li>Records of contractor/provider are kept for 21 days after their arrival and will be available for any Test and Trace purposes.</li> <li>The contractor/provider is requested to provide a risk assessment and method statement in 3 days advance of visit to school and how they will plan to minimise the risk of spreading Covid-19 in accordance with Government guidance. This will be reviewed by SBM/Head</li> </ul>	LOW	
<b>Outbreak Management: Response to Infection</b>					
20	Symptoms of COVID-19 - suspected or test positive case	Pupils and Staff	<ul style="list-style-type: none"> <li>The Academy will refer to its <a href="#">COVID-19: Outbreak Management Plan</a> and follow the recommendations set out in the local authority's <a href="#">Outbreak Control Plan</a>, if made aware of a positive case in a staff or pupil, the Senior Leadership Team will follow the London Coronavirus Response Centre (LCRC) <a href="#">resource pack</a> guidance and the DfE on 0800 046 8687 selecting option 1 for advice on isolation of contacts and for a risk assessment to be completed. The Headteacher will notify the <a href="#">Public Health Team</a>.</li> <li>We will use ongoing infection control advice and support will be made available to schools via the Public Health team</li> <li>The school will follow Government guidance on <a href="#">testing and tracing for coronavirus (COVID-19)</a>.</li> </ul>	LOW	
21	Local outbreak of virus and local lockdown	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>The Academy will refer to its <a href="#">COVID-19: Outbreak Management Plan</a> and follow the recommendations as set out in the <a href="#">Local Outbreak Control Plan</a>, if made aware of a positive case in a staff or pupil, the Headteacher will immediately contact the London Coronavirus Response Centre (LCRC) on 0300 303 0450 for advice on isolation of contacts and for a risk assessment to be completed. The Headteacher will notify the <a href="#">Public Health Team</a>.</li> <li>We will follow the LCRC guidance on communications and templates for schools to send to staff, parents of contacts, and the wider school community.</li> <li>We will follow ongoing infection control advice and support made available to schools via the Public Health team</li> <li>Lateral Flow tests may move to daily testing to help manage an outbreak</li> <li>The Headteacher will submit reports under RIDDOR of any Confirmed COVID-19 cases in the school if confirmed diagnosis of COVID-19 is likely to have been caused by an occupational exposure, that is, whether or not there is</li> </ul>	LOW	<p>Increase/decrease use of:</p> <ul style="list-style-type: none"> <li>Testing</li> <li>Face coverings</li> <li>Social distancing</li> <li>Limiting events such as parent's evenings, trips, visits to the school</li> <li>Temporary reintroduction of class 'bubble' systems to be considered to reduce the mixing of groups if</li> </ul>

			reasonable evidence that a work-related exposure is the likely cause of the disease. <a href="https://notifications.hse.gov.uk/riddorforms/Disease">https://notifications.hse.gov.uk/riddorforms/Disease</a>		the outbreak is considered to be significant enough
22	Staff and parents unsure what to do in the event of a local lockdown due to a local outbreak of COVID-19	Pupils, staff and other adults	<ul style="list-style-type: none"> <li>The Academy's <a href="#">COVID-19: Outbreak Management Plan</a> and Business Continuity Plan has been updated to include procedures to follow in the event of a local lockdown</li> <li>The Headteacher will contact the <a href="#">Public Health Team</a> and follow their advice, including what is in the <a href="#">Local Outbreak Control Plan</a>, and share with staff and parents.</li> <li>We will follow guidance on communications and templates for schools to send to parents and staff will be shared via LCRC (London Coronavirus Response Centre)</li> <li>Infection control support and training will be made available to staff via Public Health</li> <li>Lateral Flow tests may move to daily testing to help manage an outbreak</li> </ul>	LOW	
23	Spread of COVID-19 goes unchecked	Pupils, staff and other adults	<p><b>Tracing close contacts and self-isolation:</b></p> <ul style="list-style-type: none"> <li>Close contacts will be identified via NHS Test and Trace and education settings as the Academy is no longer be expected to undertake contact tracing.</li> <li>Positive cases will work with NHS Test and Trace to identify close contact and individuals will be contacted if they need to self-isolate.</li> <li>The Academy may be contacted in exceptional cases to help identify close contacts, as currently happens in managing other infectious diseases.</li> <li>Individuals are not required to self-isolate if they live in the same household as someone with COVID-19, or are a close contact of someone with COVID-19, and any of the following apply: <ul style="list-style-type: none"> <li>They are fully vaccinated</li> <li>They are below the age of 18 years 6 months</li> <li>They have taken part in, or are currently part of, an approved COVID-19 vaccine trial</li> <li>They are not able to get vaccinated for medical reasons</li> </ul> </li> <li>Individuals, will be contacted by the NHS Test and Trace, informed they have been in close contact with a positive case and advised to take a PCR test. Tests can be booked online through the NHS <a href="#">testing and tracing for coronavirus website</a>, or ordered by telephone via NHS 119 for those without</li> </ul>	MEDIUM	<p>Monitor national and local rates of infection, following the LBWF Contingency Framework should transmission levels increase within the local or wider community.</p> <p>Following national, local and Trust advice on school closure if infection rate and risks increase</p>

			<p>access to the internet. Staff, as essential workers, have priority access to testing</p> <ul style="list-style-type: none"> <li>• Lateral Flow tests may move to daily testing to help manage an outbreak</li> <li>• The school will engage fully with the local authority's public health team's <u>Local Outbreak Control Plan</u> and the NHS Test and Trace system</li> <li>• The Academy's COVID-19: Outbreak Management Plan and Business Continuity Plan has been updated to include procedures to follow in the event of a local lockdown</li> </ul>		
24	LAH COVID-19 Outbreak Action Plan		<p>The Academy's <a href="#">COVID-19: Outbreak Management Plan</a> is based on the <u>contingency framework for managing local outbreaks</u> of COVID-19 and the <u>schools operational guidance</u>, published by the Department for Education (DfE).</p> <p>The school will only implement some, or all, of the measures in this plan in response to recommendations provided by our local authority (LA), directors of public health (DsPH), Public Health England (PHE) health protection team or the national government.</p> <p>It may be necessary to implement additional measures in the following circumstances:</p> <ul style="list-style-type: none"> <li>• To help manage a COVID-19 outbreak within the school. Actions will be considered when either of the following thresholds are met: <b>There are 2 positive cases among pupils or staff who are likely to have mixed closely within a 10-day period</b></li> <li>• If COVID-19 infection rates in the community are extremely high, and other measures have failed to reduce transmission</li> <li>• As part of a package of measures responding to a 'variant of concern' (VoC)</li> <li>• To prevent unsustainable pressure on the NHS</li> </ul> <p>The Academy's <a href="#">COVID-19: Outbreak Management Plan</a> is published on the Academy's website and outlines the measures the Academy will take to step up and step down during the circumstances outlined above.</p>	MEDIUM	<p>Increase/decrease use of:</p> <ul style="list-style-type: none"> <li>• Testing</li> <li>• Face coverings</li> <li>• Social distancing</li> <li>• Limiting events such as parent's evenings, trips, visits to the school</li> <li>• Temporary reintroduction of class 'bubble' systems to be considered to reduce the mixing of groups if the outbreak is considered to be significant enough</li> </ul>

**Risk Rating : if HIGH or MEDIUM use Action Plan**

**HIGH:** current controls totally inadequate with serious consequences: death(s), serious injury, long-term ill health, or there is a very high frequency of the hazard/hazardous event occurring Immediate action required, may require task to be suspended until issue resolved

**MEDIUM:** current controls still poor but consequences less serious: minor injury, short-term ill health with no lasting effects, Action required in specific timeframe, normally within 3/6 months, may be sooner dependent on how serious an issue it is

**LOW:** current controls are adequate to minimise the risk so far as reasonably practicable, check still relevant at next review date