

Guidance to Standard Operating Procedure (SOP) for management of COVID-19 risk assessments



Project proposal to improve equality and reduce health inequalities



1. Summary of risk assessments

This guidance is to assist organisations to develop a Standard Operating Process (SOP) for managing COVID-19 risk assessments.

1.1 Accountability, governance and responsibility

All organisations must ensure they are able to demonstrate responsibility, accountability and good governance when managing risk assessments. This can be achieved by:

- Identifying leaders who understand and discharge their responsibilities for risk assessments.
- Establishing a process to ensure that risk assessments are completed, monitored and regularly updated when needed.
- Implementing a mechanism to take appropriate action on non-compliance with the risk assessment process and outcomes.

1.2 Legal framework

Employers have a legal responsibility to protect employees, and others (including service users), from harm. According to the Management of Health and Safety at Work Regulations 1999, the minimum expected is to:

- identify what could cause injury or illness in an organisation;
- determine how likely it is that someone could be harmed and how seriously (the risk);
- take action to eliminate the hazard, or if this is not possible, control the risk.

Assessing risk is just one part of the overall process used to control risks in organisations.

The minimum standards in risk management is covered by the

1.3. Communication

It is recommended that communication and consultation with external and internal stakeholders occurs at all stages of the risk management process. Communication and consultation plans should be documented for updates, reviews and improvements.

1.4 Documentation

Good documentation is a prerequisite in the successful implementation of risk management. It serves to deliver a consistent message, to speak a common language and to provide clear (risk management) objectives linked to organisational objectives. It should be constantly reviewed and evaluated.

2. Standard Operating Procedure (SOP)

2.1 Overview of SOP

A SOP is part of the risk assessment exercise itself and provides a written means to instruct employees on how a particular procedure should be carried out and lays out boundaries of responsibility. It can be used to satisfy legal compliance requirements too.

The process of writing a SOP necessitates thinking through all steps of a procedure and encourages the elimination of potential risks to the process itself. This is critical to providing reassurance and governance.

The SOP demonstrates that an organisation is committed to adopting best practice in the identification, evaluation and cost-effective control of risk to ensure that:

- They are reduced to an acceptable level or eliminated; and
- Opportunities to achieve organisational objectives and delivery of core business as usual activities are maximised.

Some of the elements that a SOP provides include:

- Transparency
- Signals uniformity in approach
- Enables comparison to review quality issues
- Helps employees understand what they need to do so the process can be reproduced by others
- Reduces variation in quality of risk assessments
- Improvement in data capture and monitoring.
- Assurance in situations where a safe system of work can only be achieved by performing the task(s) in a sequence
- Opportunity to reduce ambiguity in instructions – makes clear what must be done
- Guidelines for those who need to be trained in carrying out effective risk assessments.

2.2 Creating a SOP

Every SOP should include:

- date written, dates of revisions, name of author(s), groups/people consulted
- procedural methods/materials (detailed enough to allow someone to complete the procedure without reference to other material)
- risk identification exposure controls
- waste disposal (where applicable)
- spill procedures (where applicable)
- accident procedures
- any pertinent references
- any required record keeping protocol.

- Step 1** Decide how detailed the SOP should be. Explain each step in the procedure clearly. Identify risks to not following the procedure.
- Step 2** Decide the exposure risk to the identified hazards that each step in the SOP could present.
- Step 3** Develop a risk mitigation and control plan that employees must follow to minimise the risk of harm. The plan should cover the risks identified in Step 2. It should include personal protective equipment required, applicable work practices and referral options to other parts of the organisation.
- Step 4** (where applicable) Identify the types of wastes that will be generated and plan for how they will be treated/ disposed of.
- Step 5** (where applicable) Develop a specific plan for how spills and accidental exposures will be handled.
- Step 6** Include who the individual should notify in case of an accident and how to file an accident report.
- Step 7** Include guidance on how an individual can raise any issues about the risk assessment process itself.
- Step 8** Once drafted it is recommended that you test the SOP – allow those who will be using it to trial it. This serves to provide additional checks which may be employee or location specific, which the author(s) may not have considered.
- Step 9** Provide options for monitoring and reporting to capture organisational performance and data which can inform future improvements in employee safety and operational integrity.

2.3 Additional features of a SOP

SOPs should be brief and directly applicable. You should be able to use SOPs to train all new employees and gather examples of best practice, sometimes identifying gaps in procedure. The SOP should be able to facilitate audits of the risk assessment process, the integrity of data collected and the quality of assessments.

References

Health and Safety Executive 2020 Managing risk and risk assessment at work <https://www.hse.gov.uk/simple-health-safety/risk/index.htm> [last accessed 07/12/2020]
 Institute of Internal Auditors 2013 Position Paper, The three lines of defence in effective risk management
 NHS England and NHS Improvement (2019) Risk management framework
 NHS Oversight Framework 2019/20 <https://www.england.nhs.uk/commissioning/regulation/ccg-assess/> [last accessed 07/12/2020]

Appendix 1

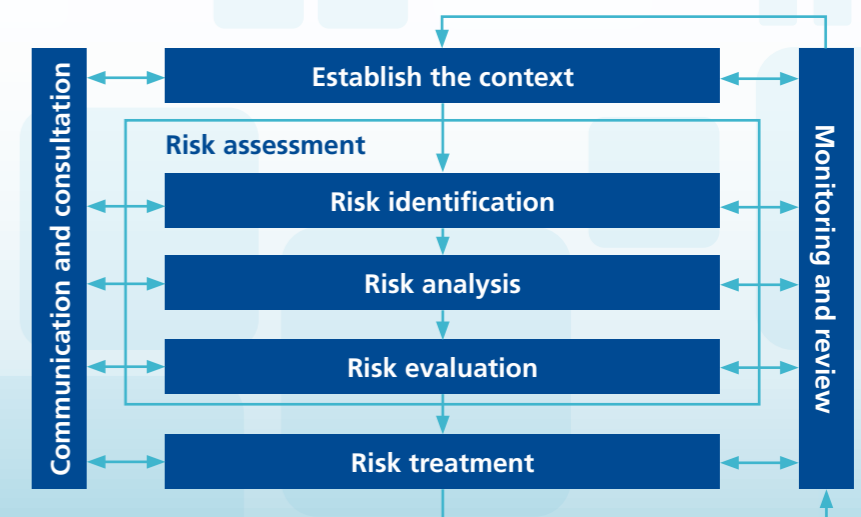
Key definitions from Risk Management Dictionary to ISO 31000: 2018, Risk Management –Guidelines

Term	Definition
Risk	'effect of uncertainty on objectives'
Risk management	'co-ordinated activities to direct and control an organisation with regard to risk'
Controls (also referred to as 'internal controls')	'measure, currently in place, that maintains and/or modifies a risk's likelihood and or impact'
Actions	'planned /future controls not yet implemented'
Impact (also referred to as 'consequence')	'outcome of an event affecting objectives' / 'the effect (i.e., on the organisations finances, infrastructure, and /or reputation etc.) when a risk materializes'
Likelihood (also referred to as 'probability' or 'frequency')	'chance of something happening' / 'evaluation or judgement regarding the chances of a risk materializing'
Risk appetite	'the amount of risk that we are willing to seek or accept in the pursuit of long-term objectives'
Inherent risk (sometimes referred to as the 'gross level' or 'absolute level' of the risk)	'uncontrolled or unmitigated level of risk' i.e. the level of risk before any control activities are applied to change the likelihood or impact of the risk Note: NHSE and NHSI do not typically record the inherent level of risk: however, it is often used by our Internal Auditors to identify the importance placed on existing control measures
Residual risk (sometimes referred to as net risk, managed risk or current risk)	'existing level of risk taking into account the current controls in place'
Target risk	'ultimate level of risk that is desired by executive and within resource envelope when planned additional actions and controls have been implemented' i.e., the position taking into account successful delivery of all mitigating actions and controls

Appendix 2

Overview of risk management process (Based on ISO 31000 Risk Framework)

Risk management process



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