



Office for Product
Safety & Standards

Prism: the new UK product safety risk assessment methodology.

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Reg 10(5), General Product Safety Regulations

(5) An enforcement authority shall in enforcing these Regulations act in a manner proportionate to the seriousness of the risk and shall take due account of the precautionary principle.

Understanding risk is key to effective product safety regulation

- Consumer Protection Act 1987:

“safe”, in relation to any goods, means such that there is no risk, or no risk apart from one reduced to a minimum, that [...] will (whether immediately or after a definite or indefinite period) cause the death of, or any personal injury to, any person whatsoever

- General Product Safety Regulations 2005:

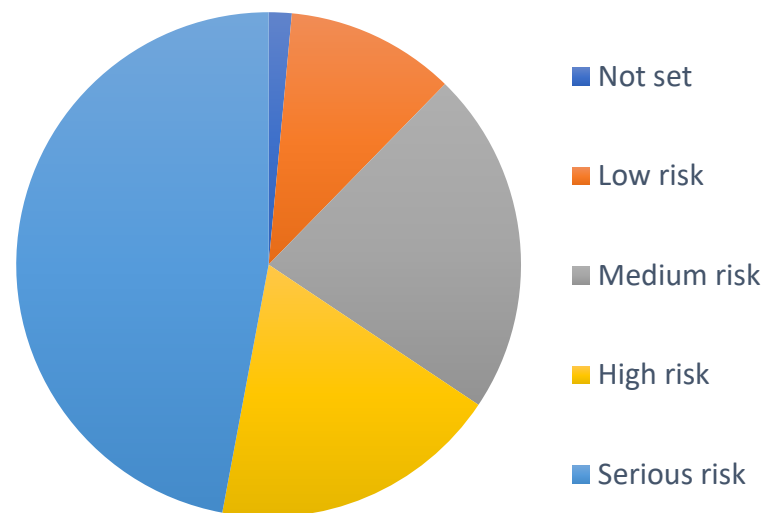
“safe product” means a product which, under normal or reasonably foreseeable conditions of use including duration and, where applicable, putting into service, installation and maintenance requirements, does not present any risk or only the minimum risks compatible with the product’s use, considered to be acceptable and consistent with a high level of protection for the safety and health of persons.

Objectives of the new methodology and guidance

- An opportunity to improve on the EU Safety Gate risk assessment guidance and methodology (known as the Rapex methodology)
- To promote the use of risk assessment
- To improve outcomes
- To resolve operational and practical matters

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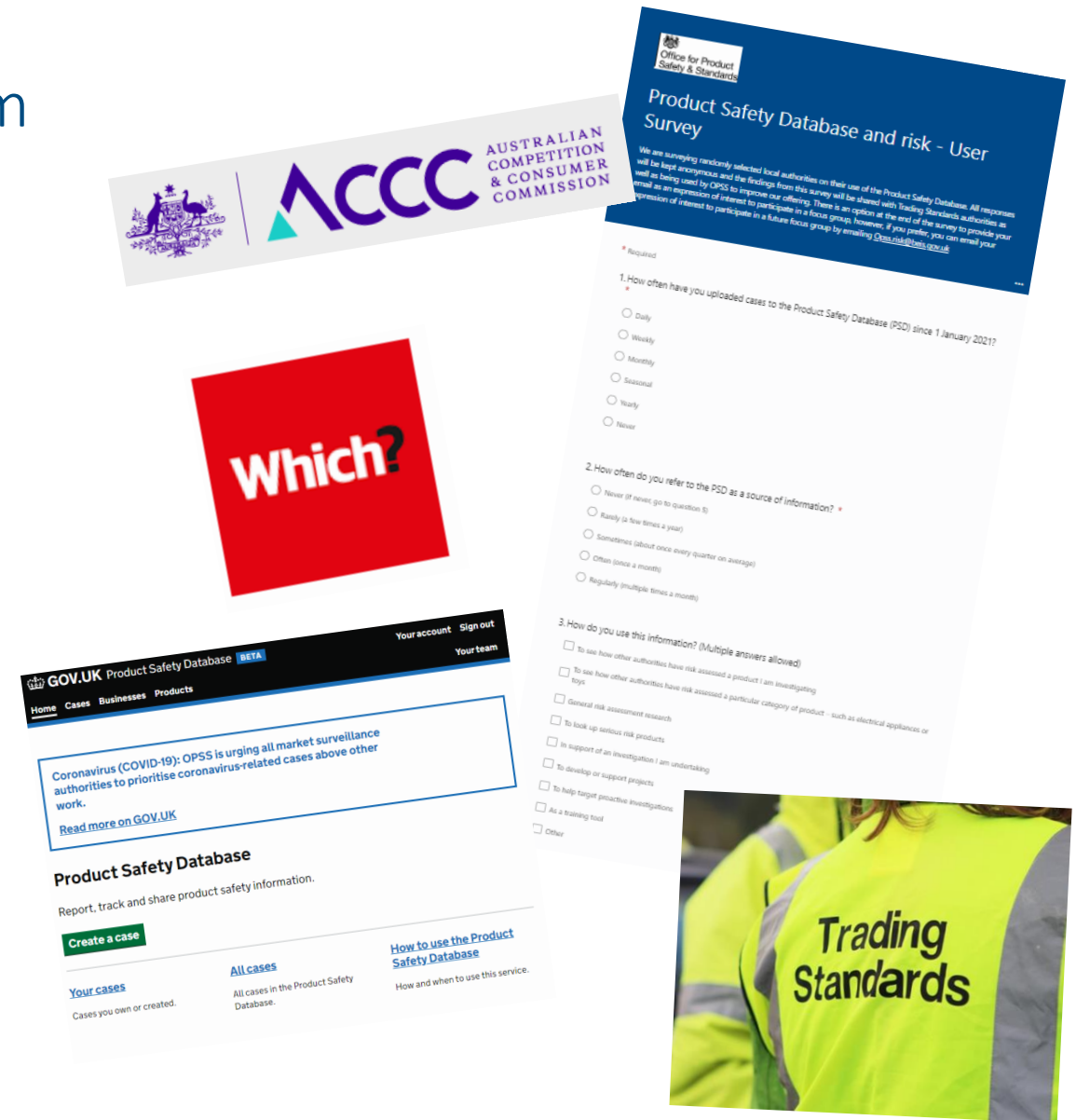
Number of cases added to the PSD without a risk label (Q1 2021)



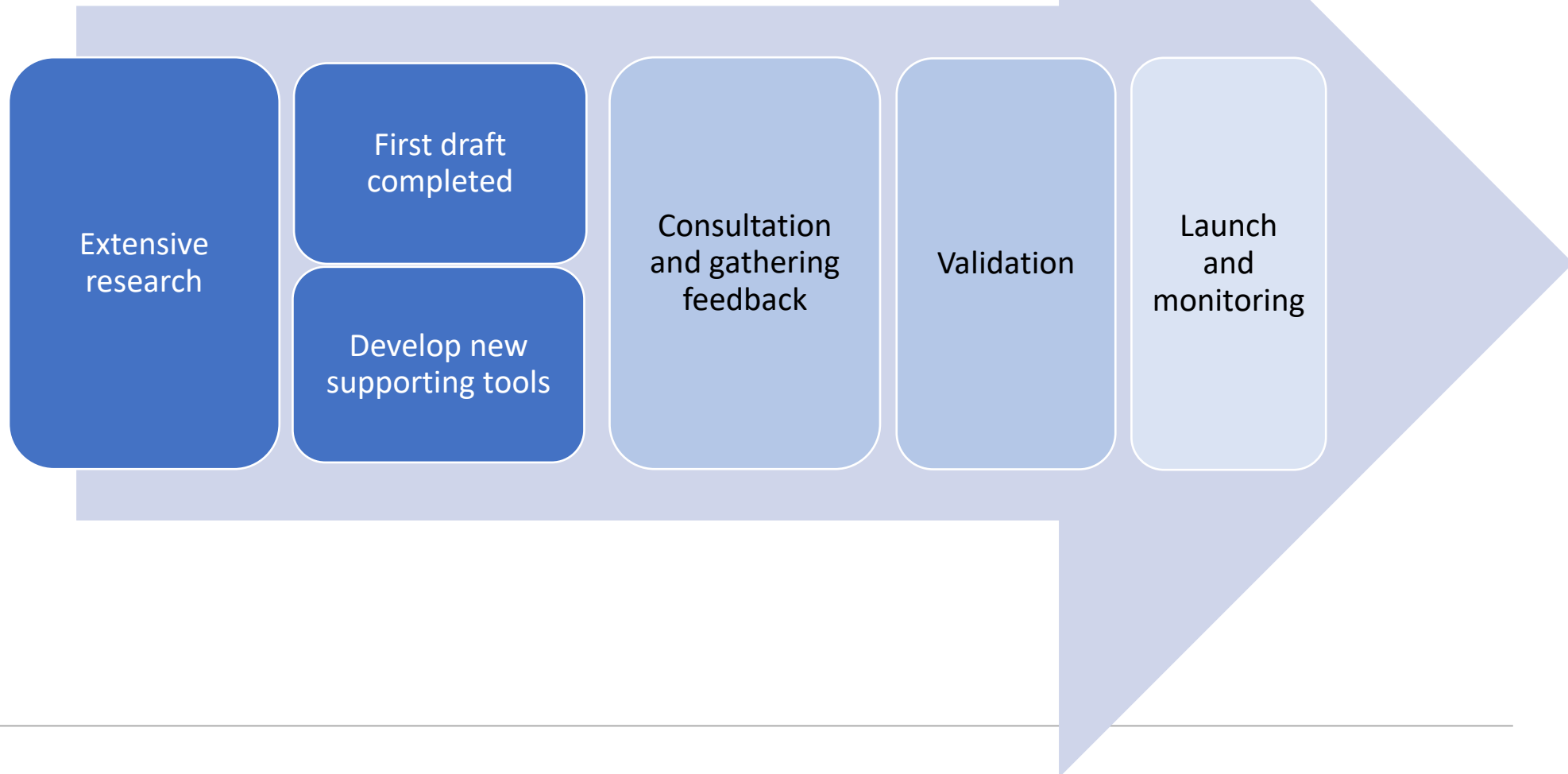
Risk labels when risk is set – almost half of all cases are deemed serious risk

The research carried out to develop Prism

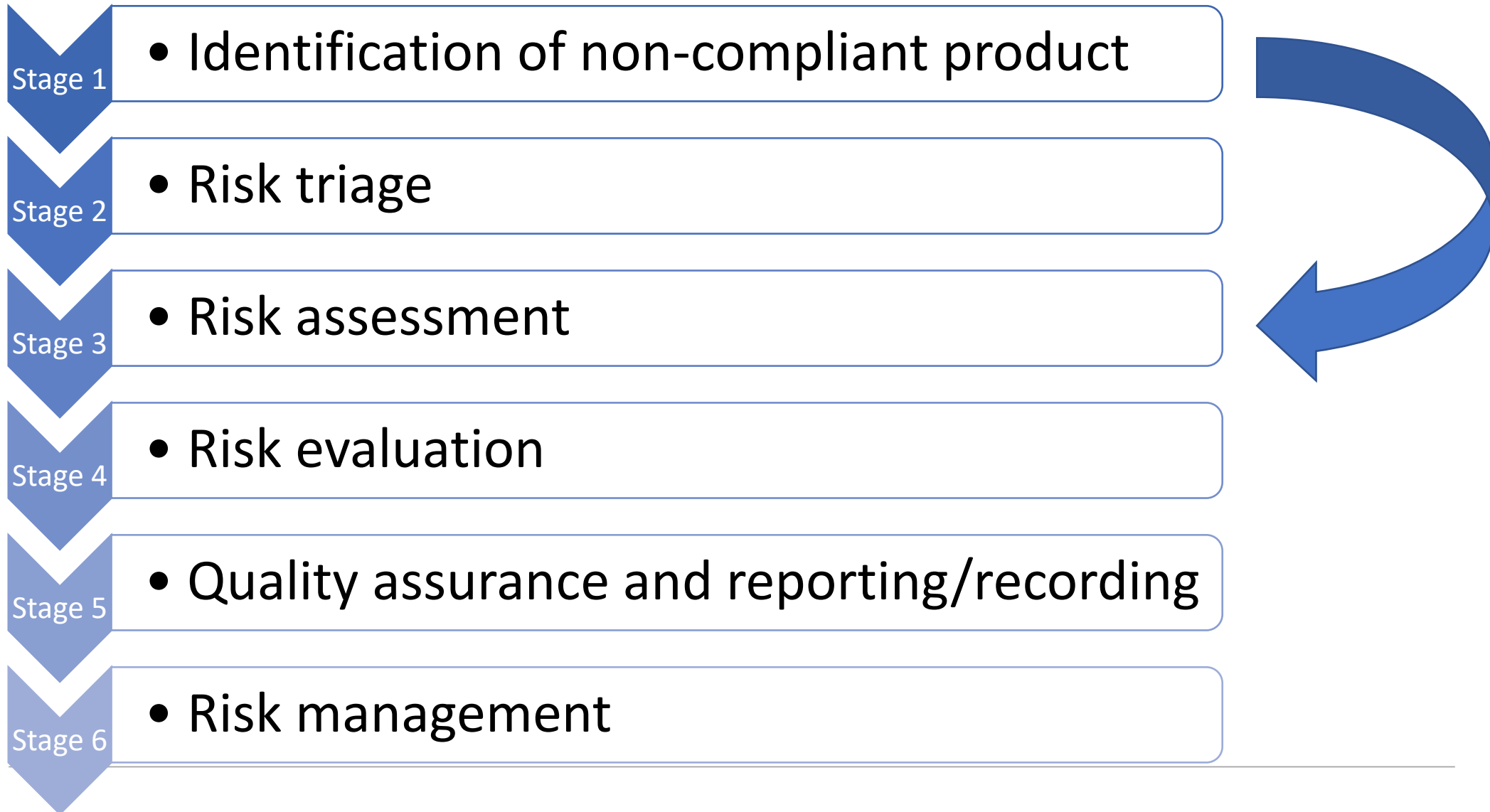
- Working group – comprising members of NPSG and representatives from some NRs
- Product safety database: review of all cases comparing cases with and without risk assessments – as well as a detailed review of the risk assessments
- Trading Standards survey
- Product Safety consultants' views
- Meeting other national product safety regulators – ACCC, CPSC
- A perspective from Consumer Bodies



The development of Prism



Prism Part 1: A new system – with risk assessment at its heart



Stage 3: Some Risk Assessment changes

- The risk assessment – more matters covered, including:
 - Product prevalence (risk to the population)
 - Replacing ‘vulnerable consumers’ with people at increased risk
 - Reflecting multiple hazards in a product
 - A reflection on the level of uncertainty
 - Additional exemption to carry out a full and detailed risk assessment before corrective action.

Supported by enhanced guidance on matters that are frequently raised by risk assessors.

Stage 3: Some Risk Assessment changes

Table 1: Level of risk (single item)				
Probability of harm over lifetime of product	Severity of harm			
	Level 1	Level 2	Level 3	Level 4
>1 in 100	High risk	Serious risk	Serious risk	Serious risk
>1 in 1000	Medium risk	High risk	Serious risk	Serious risk
>1 in 10,000	Low risk	Medium risk	High risk	Serious risk
>1 in 100,000	Low risk	Low risk	Medium risk	High risk
>1 in 1,000,000	Low risk	Low risk	Low risk	Medium risk
<1 in 1,000,000	Low risk	Low risk	Low risk	Low risk

Stage 3: Some Risk Assessment changes

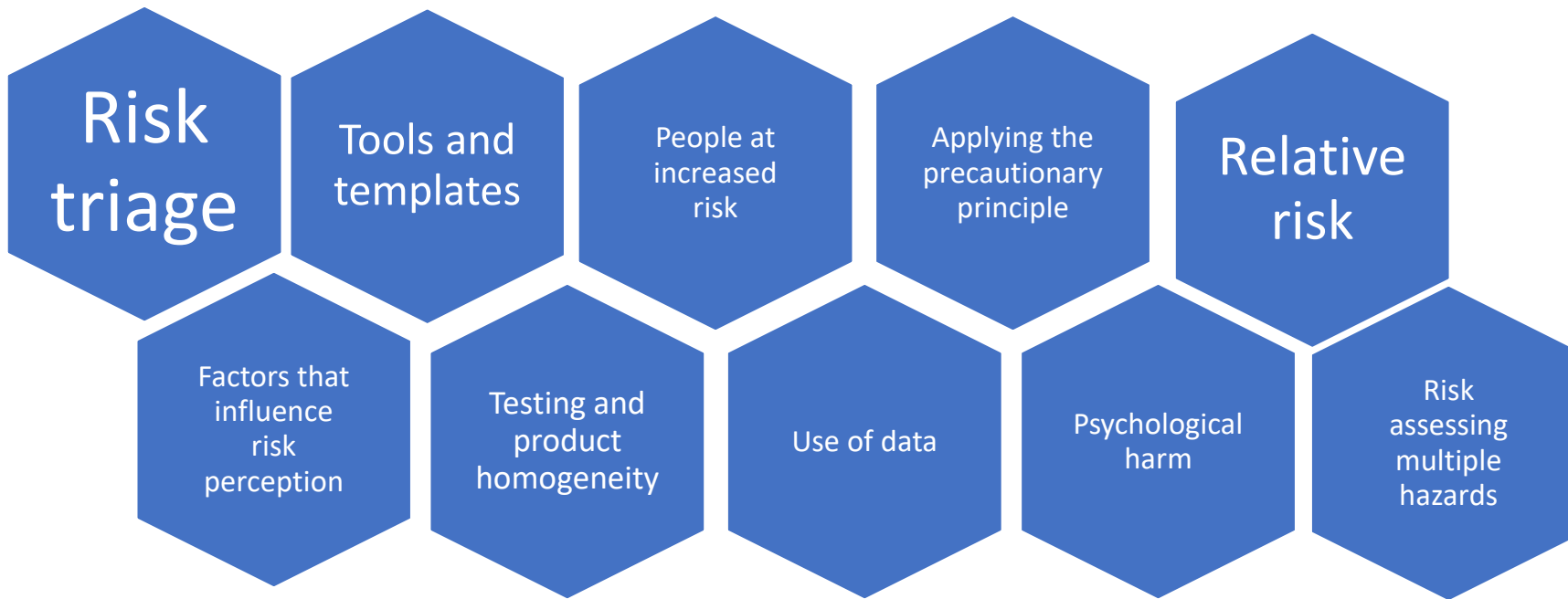
Table 2: Level of Risk (all items)				
Estimated number of items in use	Risk associated with single item (derived from Table 3)			
	Low	Medium	High	Serious
>1m	High risk	Serious risk	Serious risk	Serious risk
500k – 1m	High risk	High risk	Serious risk	Serious risk
100k – 500k	Medium risk	High risk	High risk	Serious risk
50k – 100k	Medium risk	Medium risk	High risk	High risk
10k – 50k	Low risk	Medium risk	Medium risk	High risk
1k – 10k	Low risk	Low risk	Medium risk	Medium risk
<1k	Low risk	Low risk	Low risk	Medium risk

Stage 4: Risk Evaluation

Risk evaluation – the step between risk assessment and risk management:

- Other types of harm
- Potential for multiple casualties
- Comparative risk labels: risk differential and relative risk
- Benchmarking
- The level of uncertainty
- Action taking place elsewhere
- Factors relating to perception of the risk
- Consideration of all levels of risk

Prism Part 2: Additional factors relevant for more complex assessments, and more general additional guidance



Over to you

How do you apply product risk to your compliance processes?

How does your business assess product safety risk?

Could Prism go further – what is missing/not strong enough?

What is the most difficult aspect of risk assessment for your business? Will Prism resolve this?

Do you provide your risk assessments to regulators/enforcement authorities?

Are conversations on product risk with regulators transparent?