# Safety Health and Environment Annual Report 2020-21

*Safety, Health and Environment is Everyone's responsibility*

The University is fully committed to managing its activities to protect the environment and safeguard the health and safety of its employees, students, visitors, the community, and all other interested parties.

The University's safety, health and environment strategies, policies and procedures provide the guiding principles to ensure that high standards are achieved while offering a means of promoting continuous improvement in safety, health, and environmental matters.

It is therefore essential that UCLan's SHE management arrangements continue to evolve in line with changing national and local priorities and new legislative and best practice requirements. In 2018 we implemented a challenging plan to review and transform UCLan's Safety, Health & Environmental at UCLan with the aim:

- To ensure that employees, students, visitors, contractors, and other interested parties are kept safe while at UCLan.

- To safeguard the environment and community from the effects of the University's activities.

- To ensure that the University complies with legislative requirements and best practice.

- Ensure that safety, health, and environment is everyone's responsibility, and everyone understands their responsibilities.

Much of this original plan has been achieved, despite the ongoing significant disruptions presented by the COVID-19 pandemic.

To further ensure that SHE issues were given the acknowledgement and regard that the University required, the SHE Department was moved out of the Estates Services structure in mid-2021 and placed under the direct management of the Chief Information and Infrastructure Officer.

Additionally, the University's Security and Emergency Planning functions were integrated into the SHE Department under the management of the Director of Safety, Health and Environment.

The following report represents the University's safety, health and environmental performance and achievements for the academic year September 2020 to the end of August 2021.

# Management of the University's response to the COVID Pandemic

In line with governmental requirements September 2020 saw the introduction of a blended working and learning experience for both our staff and students for the new academic year with only some specified professional health care courses permitted to return to face to face teaching with the remainder delivered online.

Many significant COVID restrictions to people's social mobility remained in place including the 'rule of six', social distancing, mandatory face coverings in many settings, etc., which set the University many challenges to ensure they were planned for, put in operational practice and were adhered to.

The proactive management of COVID issues by the Coronavirus Emergency Management Group over the previous six months to September 2020, put in place robust foundations from which to build the COVID management arrangements for the new academic year.

The Coronavirus Emergency Management Group worked tirelessly to ensure identified arrangements were put in place both strategically and operationally, so the campus was ready for opening as far as was obtainable under prevailing governmental restrictions.

**The University's Key Principles for COVID management:**

- The safety, health and wellbeing of our university community is our key priority and will be at the heart of our planning and decision-making
- At all times our policies and guidance will align with Government, public health and health and safety requirements and guidelines.
- We will communicate and engage with staff, work in partnership with trade union colleagues and assess the Equality Impact of our policies and decisions, to foster a shared purpose of maintaining a safe, accessible, flexible and inclusive workplace.
- To ensure we can continue to deliver our core academic business
- To operate in a socially distanced manner consistent with Government guidelines and best practice
- To embed, where possible, the good practice we have developed during the pandemic.

**Practical measures introduced:**

- Practical measures were introduced and removed at various points in the paramedic.
- Continual review of University Overarching COVID risk assessment against new government advice (national and local level), best practice and assessment of effectiveness of introduced COVID controls.
- Mandatory online COVID training and awareness for all staff and students highlighting what COVID was, preventative measures to be taken, how to report cases and the University's safety management arrangements in place to help ensure the well-being of all those attending campus.
- Staff and students asked to complete a COVID Return to Campus Individual Assessment and Impact Form that assessed a person's vulnerability to COVID and what preventative measures were required for those who are deemed vulnerable.
- Introduction of a UCLan Covid-19 Community Responsibility Agreement.
- Enabling staff and students to study and work from home to ensure that 2m social distancing can be adhered to on campus, the less people on the campus at any one time the easier it is to social distance and therefore minimising the risk to staff and students.

- Mandatory wearing of face coverings when entering/egress buildings, in corridors, circulation spaces, toilets, etc., all staff and students provided with two reusable face coverings.
- Keep left, COVID rules, handwashing, face covering signage within all buildings, 400+ hand sanitiser units, protective screens on service desks, increased cleaning regime for high traffic/contact points, cleaning materials in classrooms.
- Provision of COVID-19 related PPE.
- SafeZone App promoted so both staff and students could raise COVID issues quickly and efficiently.
- Rigorous process for any requests for essential work to be undertaken at less than 2m distancing.
- Provision of resources to help with positive mental wellbeing whilst remote working.
- Significant restrictions on staff travel and visitors to campus only via VCG approval.
- Campus COVID testing centre – over 35,000 tests conducted Nov 2020 – end of Aug 2021.
- Robust reporting process for COVID cases.
- Food packs for student required to self-isolate in halls of residence.

Though the University witnessed a number of both local and national lockdown periods during the academic year 2020 – 2021 due to national and local CIOVID cases, the University's proactive and comprehensive approach to COVID management arrangements again paid dividends with the recording of relatively low rates of COVID infection with no significant outbreaks in halls and no linked cases related to face to face classroom teaching. The campus community was able to work off campus and on campus with confidence.

All staff and students who complied with the University's COVID arrangements and helped to operationalise and monitor them should be commended for helping to make our campuses as COVID free and safe as practicably possible.

Even with the governments enhanced COVID vaccination programme, the continued successful management of COVID issues will continue to be a challenge for the University and for its staff and students during the academic year 2021-22.

## University Safety, Health & Environment Policy

The University's Safety, Health & Environment Policy is at the forefront of driving forward the transformation of SHE management across the University. The policy stresses that everyone has a responsibility for safety, health, and environment within the University and this is managed via the line management structure to ensure its effective management.

The Policy outlines the responsibilities of the Board, the Vice Chancellors Group, Executive Deans, Heads of School & Directors of Professional Services, Line Managers, Supervisors, Academics, Technicians, other staff, Students, Contractors, Visitors, and members of the Public. The successful implementation of the policy requires the full support and active co-operation of all our staff, students, and other interested parties.

The Policy will be reviewed and re-signed off by the Vice Chancellor during late 2021, taking into account new statutory requirements, the new University Strategic Plan 2021-2028 and its associated 5 key Sub Strategies and the views of our various interested parties as required.

# Embedding Safety, Health and Environmental Management throughout UCLan

To equip managers with an understanding of their safety and health responsibilities the SHE Department have established a delivery programme for the Institute of Safety and Management's (IOSH) 'Managing Safely' course. Delegates gain an understanding of how to assess and control risk, investigate incidents within their own area and reflect on good practice.

Due to the continued COVID restrictions on face to face meetings the IOSH Managing Safely course continued to be delivered successfully online with 30 staff completing the course. However, the uptake of this course generally by managers is still low and this needs to be improved during 2021/2022.

# Safety, Health & Environmental Integrated Management System (IMS)

The University has implemented an integrated safety, health and environmental management system (IMS) in the form of 123 policies and procedures and numerous Detailed Work Instructions such as template risk assessments to allow the University to manage its SHE legislative requirements and to identify and control risks before they lead to an undesired event.

During Summer 2019, following extensive auditing by the University's chosen external accreditation body the British Standards Institution (BSI), the University had its Safety, Health & Environmental IMS at our Preston campus accredited to the prestigious international standard ISO 45001 for Occupational Health & Safety and continued its accreditation to ISO 14001 for Environmental Management also at the Preston campus.

Accreditation to these standards and the bi-annual external auditing process provides the University Board, the Vice Chancellor, and the Vice Chancellors Group with reassurance that safety, health and environmental issues being effectively managed.

In December 2020 following further external auditing by BSI, the University further extended its accreditations to ISO45001 and ISO 14001 at the Burnley Victoria Mill campus and in February 2021 at the Westlakes campus.

The IMS at the Preston Campus was again successfully audited by the BSI in July 2021 with continued accreditation recommended, only five minor unconformities were identified during the entire audit which are being addressed and will be re-inspected during the next scheduled audit in February 2022.

In line with the requirements of the ISIO standards the SHE Department continually looks at ways of improving effectiveness of the University's IMS and SHE performance. During the academic year this included:

- Renumbering all SHE policies and procedures to improve accessibility.
- Introducing a formal auditing schedule across all campuses, schools and services.
- Updating the SHE Department SharePoint site.
- Revising the DSE assessment and training resources to take into account the increase in remote / home working away from camps.



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# Accident, Incident & Near Miss Recording

Improvements have also been made to how we gather our accident, incident and near miss information. In 2020 we launched our new electronic reporting system which allows us to view, manage and report easier and quicker.

The reporting system categorises into five content types, Accident, First Aid, Near-Miss, Environmental and Occupational Ill-Health, enabling us to clearly see the type of reports that are coming through and if there are any trends or reoccurring incidents.

When a report is submitted the mailbox for the SHE Department is notified, and the report is then assigned to one of the SHE Advisers to investigate.

From September 2020 to August 2021 there were:

- 62 Accident reports
- 3 Environmental Incident reports
- 27 First Aid reports
- 38 Near Miss reports
- 1 Occupational Ill Health report

The figures are lower than we would usually expect due to less activity taking place on campus during the pandemic.

In order to raise awareness of accidents and incidents across the University the SHE Department has an 'In the Green' initiative. This provides a tangible view of the frequency of accidents. Days shaded red indicate that an accident/incident occurred to a member of staff/ a student or visitor. Days shaded black indicate a more serious accident/incident that required reporting to the Health & Safety Executive (HSE) under the requirements of RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013).

The diagram below shows all accidents for September 2020 to August 2021.
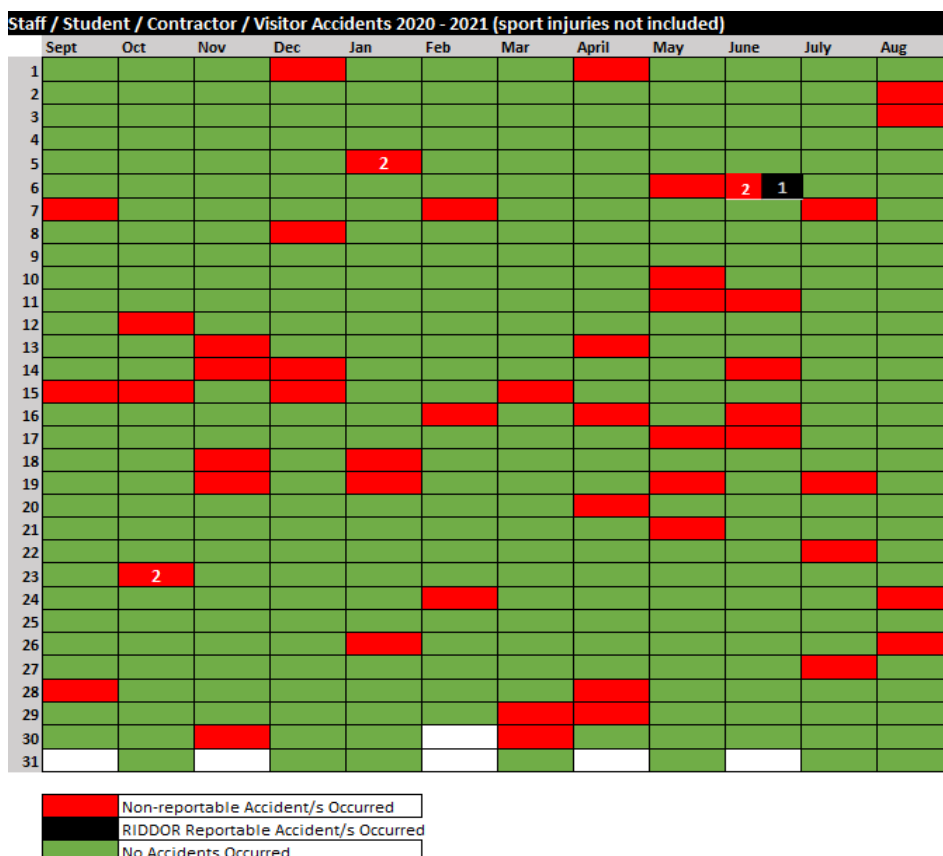


The RIDDOR report in June 2021 refers to a trespasser who was climbing a 4m fence at the Sports Arena to gain access to a pitch out of hours and fell from the fence cutting his bicep which required hospital treatment.

## Mandatory Training

Training is essential to achieve and demonstrate competency in SHE issues. The SHE Department continue to add training courses to its portfolio and have adapted a number of its courses for online delivery due to COVID. A Return to Campus COVID-19 Training course was launched for 2020/21 which was mandatory to all staff and students to complete if they were required to return to Campus.

All staff must complete the following online training:

- Safety, Health and Environmental Awareness (new course added in December 2018)
- Fire Safety Awareness
- Display Screen Equipment (mandatory for all computer users)
- Return to Campus COVID-19 Training (new course added August 2020)

In addition, training is available in a number of areas such as Stress Awareness and Management, risk assessment, manual handling, lone working, COSHH (Control of Substances Harmful to Health) and event safety management.

| Mandatory Training Completion Rates (to date) | TARGET | CURRENT |
|---|---|---|
| Percentage of staff who have completed SHE Awareness | 100% | 57% |
| Percentage of staff who have completed Fire Safety Awareness | 100% | 95% |
| Percentage of line managers who have completed IOSH Managing Safely | 100% | 20% |
| Percentage of staff who completed Return to Campus COVID-19* | NA | 76% |

*Only staff returning to campus were required to complete this course.

## Fire Risk Management

Across the University we recognise that fire is a major risk to the lives of our staff, students and members of the public who visit the University. The loss of buildings and infrastructure due to fire also poses significant risks to the continuing research and teaching functions undertaken within the University and hence we therefore ensure that fire safety is a priority in all areas of the organisation under our control. We utilise current and developing sector best practice and guidance to ensure that our fire risk management system is not only robust in ensuring we identify and manage the risks presented across our extensive property portfolio but that we do not simply comply with our legislative requirements but strive to exceed them whenever possible.

Throughout this year, despite the impact of Covid-19, we have continued to carry out support functions to ensure the successful and safe operation of our buildings and facilities whilst substantial infrastructure development and improvement practices have been going on and have continued to provide technical support and input across a range of University related events both on and off campus.

We have further developed our existing fire risk assessment methodology to better reflect safety aspects and guidance presented following the outcome reports of the Grenfell tragedy and other incidents of note, and have continued this ethos into our updated fire safety awareness and fire marshal training packages provided for colleagues across the campus.

Working in partnership with the Fire and Rescue Services for the relevant areas we have facilities in, we are actively using best practice and guidance to ensure that we reduce the number of unwanted

fire calls placed to the Fire and Rescue Services by a proactive approach of managing risk, education and by our own response programme; whilst nationally we have seen a reduction of about a third of all calls achieved in recent years, across the University over this past year we have managed to respond to and manage effectively 60 such calls without external assistance.

Such an achievement not only supports the local Fire and Rescue Services to better manage their resources appropriately, it ensures that, as much as possible, we minimise disruption to our colleagues and students and help to maintain our student experiences at the highest level.

## Sustainable Travel

During 2020/2021 sustainable travel initiatives continued to progress in support of the University's Travel Plan. New additions for 2021 include a student bike hire scheme and a dedicated space for a Bike hub as well as a brand new 40 space secure cycle compound, at our new Student Services Building.

Due to the pandemic and unusual work and study patterns, no commuter travel survey was conducted this year. Results below from 2019/20 showed that overall car use was below target which was positive. A comprehensive Travel Survey will be conducted in November 2021 and will report on emerging 'return to work' travel patterns.

| Staff Commuter Travel Modal Split 2019 | | |
|---|---|---|
| **Mode** | **Target** | **Actual** |
| **Car Solo Commuter** | 47% | 48% |
| **Car Share** | 15% | 10% |
| **Car Use Combined** | 62% | 58% |
| **Rail** | 12% | 15% |
| **Bus** | 8% | 9% |
| **Cycle** | 6% | 8% |
| **Walk** | 12% | 9% |
| **Motorcycle** | - | 1% |

Domestic business travel modes and carbon emissions are monitored via the Travel Plan. Modal split analysis shows grey fleet (private vehicles) accounted for 38% of all carbon emissions associated with domestic business travel, this has been an increasing trend over the past few years.

**Domestic Business Mileage Modal Split 2019/2020 & 2020/21**
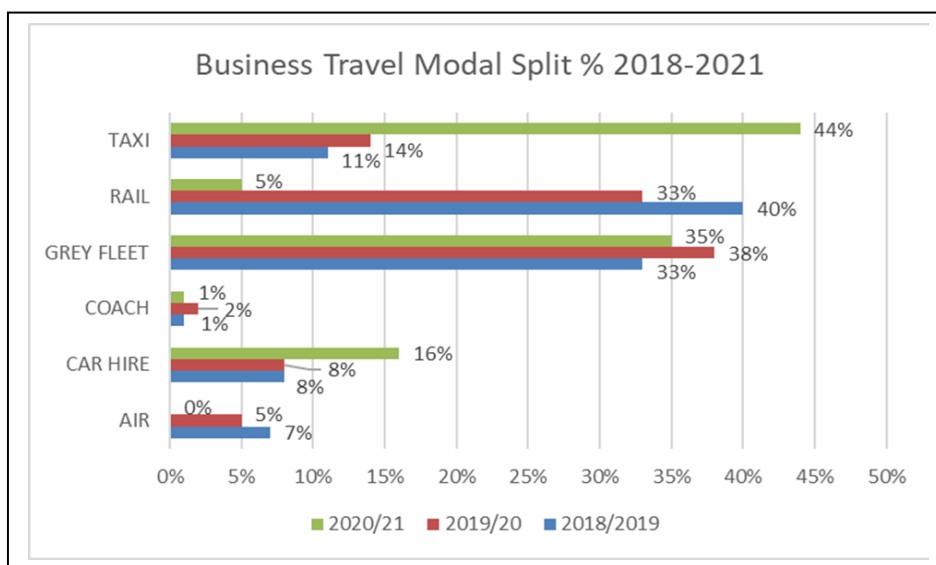


Due to the governments 'safer travel' guidance, the domestic business travel modal split gives a true representation of the social distancing measures that the university has been under. Significantly lower numbers using public transport, with more staff choosing to travel using their own personal vehicle, a hire car or taxi.

Typically, international business travel data is also collected using the same process for domestic business travel, using flight data booked through the Travel Office from our financial reporting system, from which mileage and carbon emissions can be estimated. Data from 2020/21 cannot be compared to a typical year, however, it will be interesting to see what impact the pandemic has had on international business travel patterns in the future.

Carbon emissions from business travel (by both staff and students) will be reported to HEFCE when the reporting of Scope 3 travel emissions becomes mandatory in the Estate Management Records. In the meantime, this data is collated and monitored internally and provides useful base line data.

As part of the annual review of the university's Travel Plan, the Sustainable Travel Action Plan has been updated to reflect the objectives for 2021/2022.
These include:

- Modal Shift - Investigate the feasibility of purchasing a Scoping Tool to identify specific staff commuter modal shift opportunities
- Roll out cycle training to our Security Team who want to use the new e-bikes provided for greener travel around campus
- Improve on cycle security reducing the number of cycle thefts
- Improve internal and external online communications in terms of our sustainable travel initiatives and facilities
- Utilise the new Bike Hub with Free Dr Bike, secure marking, bike maintenance and training events
- Investigate the feasibility of duplicating the bike hire scheme at UCLan Burnley campus
- Bus Travel Discounts – Negotiate UCLan discounted travel with Transdev for our Burnley students and Stagecoach Cumbria for our Westlakes students, matching our UCLan Preston offer.
- Remote/Home Working - COVID-19 has ensured that the UCLan workforce is well equipped to work remotely, the need to travel has been removed during the pandemic and hopefully going forward more meetings will be conducted online. Monitor business travel figures post-pandemic to evaluate any shift in business travel patterns.

## Occupational Health

The role of the Occupational Health provider (Salus) in delivering services to the University had to rapidly adapt and develop due to the restrictions the COVID-19 pandemic placed upon face to face meetings and referrals. The priority being to protect and safeguard the health and wellbeing of all staff working both remotely from home and/or in the workplace.

The Occupational Health provider continued to meet regularly with the SHE/HR teams to ensure the University met its statutory requirements. The provider continued to collect statistical data, and provide monthly, quarterly and annual reports to UCLan and the providers management team regarding the OH service delivery.

During the academic year great care was taken to ensure the most vulnerable groups to Coronavirus were fully supported, and kept as safe as possible, by reducing risks and providing advice to protect and safeguard worker's health in-line with government and HSE advice available at any particular time.

As this advice continually changes and evolves, Occupational Health will keep the University advised as to best clinical advice and implications for the health and wellbeing of their employees.
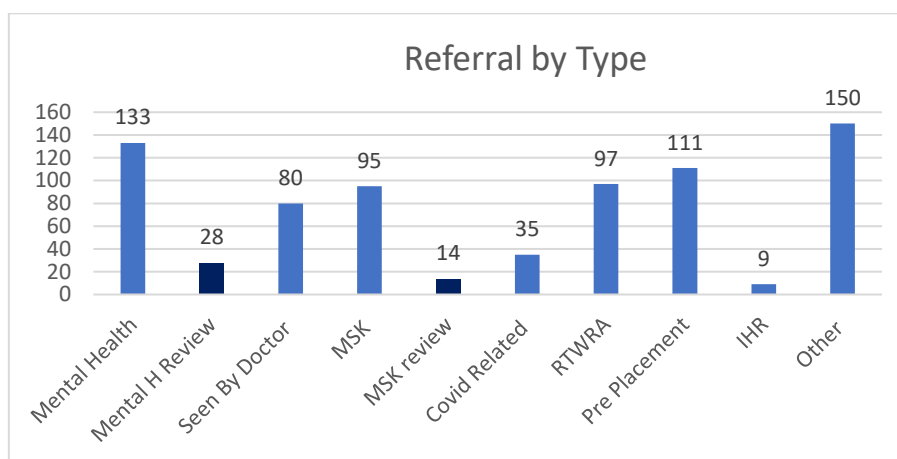
**Management Referrals**

COVID restrictions led to a significant increase in remote service provision including case management and fit for work referrals, Covid-19 risk assessments and providing advice for staff. Telephonic based work become the standard with an additional capacity to utilise video consultations if appropriate.

A total of 764 employees were seen in the department during the academic year 2020 - 2021.

Interestingly to date, data shows that working remotely throughout the pandemic has reduced the cancellation rate compared with previous years as it offers staff a more flexible and easier route to access OH services.

Every employee who requires an appointment with occupational health has options including face-to-face, telephone or video consultation to reduce risk of Covid-transmission, protect and safeguard worker's health.
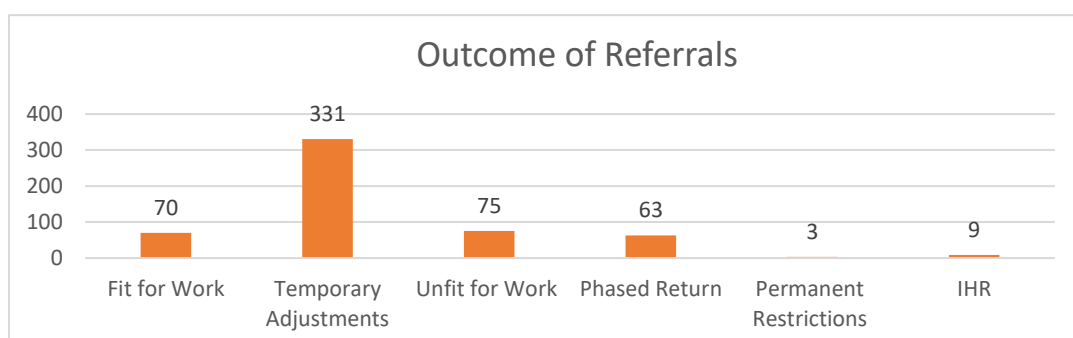
In order to improve the management referral process case meetings for key stakeholders, managers, employees and HR may be arranged to deal with more complex cases. Benefits of Case Meetings include staff engagement, enhanced employee well-being, promotion of mental wellness, protecting and safeguarding employees' health.

### Referral by Type

| Type | Value |
|------|-------|
| Mental Health | 133 |
| Mental H Review | 28 |
| Seen By Doctor | 80 |
| MSK | 95 |
| MSK review | 14 |
| Covid Related | 35 |
| RTWRA | 97 |
| Pre Placement | 111 |
| IHR | 9 |
| Other | 150 |

Other health conditions include:

| | | |
|---|---|---|
| Cancer | Kidney | Uterine conditions |
| Eye/Migraine | Liver | Blood disorders |
| Neurological | Respiratory | Minor ailments |
| Pregnancy | ENT | |
| Heart Conditions | Intestine/Gastro | |

The outcome for the referrals and reviews show that the majority of cases resulted in a conclusion "fit to work with temporary adjustments" which highlights the benefits of consultation and partnership working with the OH services.
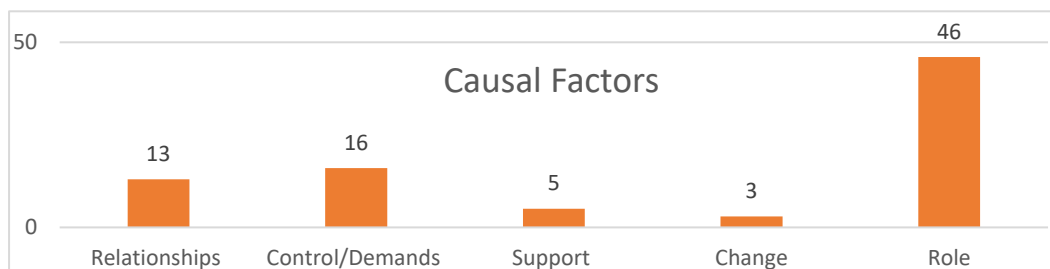
### Outcome of Referrals

| Outcome | Value |
|---------|-------|
| Fit for Work | 70 |
| Temporary Adjustments | 331 |
| Unfit for Work | 75 |
| Phased Return | 63 |
| Permanent Restrictions | 3 |
| IHR | 9 |

**Mental Health**

The COVID pandemic has the potential to have a significant impact on the mental health of many in the UK workforce particularly across the most vulnerable groups. Social distancing and physical isolation at home among family members can put these vulnerable groups at increased risk of anxiety, distress, and depression and induce further trauma.
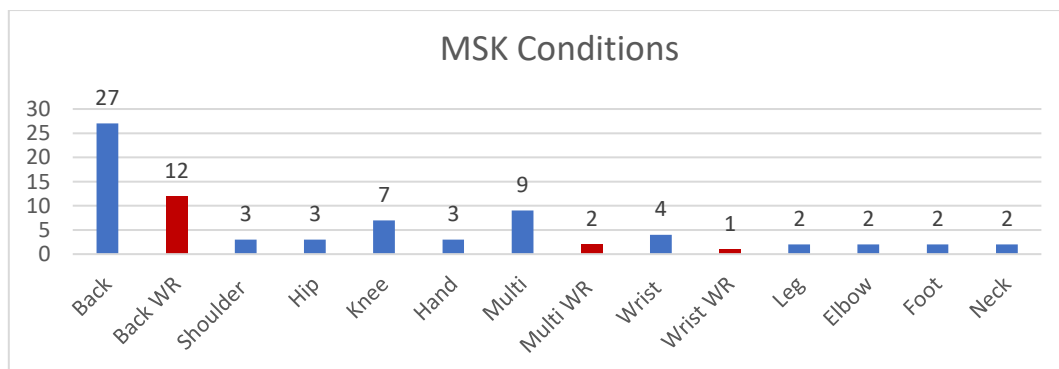
The Staff Counselling service has continued to provide therapeutic support for staff during the Global Pandemic remotely, alongside Remploy and Access to Work Mental Health services, and Health & Wellbeing Services. The Occupational Health Nurses continue to play a valued role in providing support and signposting staff to the appropriate mental health and other additional support services as and when required.

Of the 133 Mental Health New Referrals 83 cases were identified as work related, the graph below shows the reasons with Role being the highest. Some of the common themes highlighted by staff include: increase workload, working patterns and environment, inadequate resource, operational change, lack of managerial support, working relationships, role expectations to meet business demand alongside the impact of Covid-19 and Global Pandemic.

**Causal Factors**

| Relationships | Control/Demands | Support | Change | Role |
|---|---|---|---|---|
| 13 | 16 | 5 | 3 | 46 |

**Musculoskeletal (MSK)**

Of the 95 New MSK referrals 15 were identified as work related (WR) Highlighted in red below.

**MSK Conditions**

| Back | Back WR | Shoulder | Hip | Knee | Hand | Multi | Multi WR | Wrist | Wrist WR | Leg | Elbow | Foot | Neck |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 27 | 12 | 3 | 3 | 7 | 3 | 9 | 2 | 4 | 1 | 2 | 2 | 2 | 2 |

The graph above shows the main causes for MSK conditions, multi indicates more than one area of the body/limbs affected i.e. Shoulder & neck or back & neck etc. Work Related Cases included the use of safety boot issues, trips & falls and ergonomic difficulties during the Covid-19 Pandemic due to the significant increase in home-working.  Working closely with HR/SHE and IT team all staff have been asked to undertake their DSE risk assessments and supplied with work equipment suitable for home working to remain DSE compliant.

As Covid-19 restrictions ease staff may return to campus to resume their normal job role and some may take-up a blended approach involving a mix of home-working and on-site delivery to meet role requirements.

**Health Surveillance**

Health Surveillance (HS) work such as statutory medicals, audiometry, respiratory and skin assessments were postponed for safety reasons due to the Global Pandemic in line with UK government and HSE advice. However, paper surveillance to meet legal requirements continued in accordance with HSE and Public Health guidance to protect and safeguard staff health, 83 of these were conducted. Any serious health issues arising from paper surveillance can be followed-up if necessary, with face-to-face assessment subject to a full Risk Assessment taking place.

A health surveillance Matrix was completed, and remote HS continued pending return of the OH Nurses to site-based work. Whilst there is presently minimal face-to-face health surveillance work is being undertaken. The OH Nurses have seen an increase in management referrals, remote health assessments and Covid-19 related referrals. Health Surveillance will continue to be carried-out remotely by department and results uploaded onto the secured shared drive until return to site-working is permitted.

**Travel Health Clinic, Vaccinations & Immunisations**

The Travel Health Clinic, Vaccinations & Immunisation's service is provided in partnership with Superdrug to offer flexibility and scope for widespread coverage to suit staff requirements. Staff are referred to Occupational Health who will then issue staff with a referral letter to arrange appointments with Superdrug directly at venues in convenient locations.

The University offered seasonal flu vaccines to all staff and will do again in 2021-2022.

Due to the travel restrictions imposed by the COVID pandemic, staff and student travel was not permitted throughout the academic year, this will resume in September 2021 pending government changes in overseas travel advice

This service has now resumed in line with UK government advice. Travel advice will continue to be provided by the OHNA and employees will be signposted to their chosen areas for vaccinations and medical supplies. Meetings with Superdrug, SHE team and OH provider continue to be carried out monthly to evaluate and feedback on the service. Statistical data will be provided to the SHE team and recorded for both medical and audit purposes.

**Physiotherapy & Ergonomic Assessments**

Due to the Global pandemic, face to face referrals to the University Physio department, for ergonomic assessments and physical therapy to assist rehabilitation. was postponed pending the easing of lockdown restrictions, subject to updated UK Government advice this service will be resumed from September 2021.

This service is monitored by Occupational Health to highlight trends patterns in musculoskeletal conditions by departments. Referrals to the physiotherapist are chargeable and have to be approved by management upon recommendation from Occupational Health. Alternatively, staff can refer themselves privately for treatment if required.

**Occupational Health Physician**

The Occupational Health Physician (OHP) continued to provide remote consultations pending return to site-based work in line with contract requirements and UK Government advice. OHP covers specialist areas such as fit for work assessments, ill health retirals, providing specialist OH advice, particularly around very complex cases.

The OH carried out their role predominantly utilising telephonic referrals with the capacity to use secure video call services where appropriate. Where necessary schedules may be reviewed and adjusted accordingly to suit the needs of the University and/or the employee. Case meetings with the OH clinician, HR, Managers and employee are being considered to deal with the more complex cases.

The OH clinicians are planning to return to campus in a blended way from week commencing Monday 27th September 2021, although some remote services will continue. The blended approach will consist of a mixture of face-to-face, telephone and video appointments which will be considered against the business needs of the University, numbers of employees attending the workplace and a clinical triage allocation process.

## Safety, Health & Environmental Objectives 2021-2022

Given the ongoing nature of the COVID pandemic any objectives that could potentially be set for the forthcoming academic year would have to take second place due to the reactive nature of issues related to the COVID pandemic and how it may progress during 2021-2022.

**Potential Objectives**

| | Objective | Timescale | Measure of success |
|---|---|---|---|
| 1. | Continued reaction to and management of COVID issues that affect the University, its campuses, and its community. | Ongoing | |
| 2. | Review University SHE Policy taking into account new statutory requirements, new University Strategic Plan 2021-2028, its 5 key Sub Strategies and the views of our various interested parties as required.<br><br>Develop a safety, health, environmental compliance, security, emergency planning and business continuity enabling strategy to support the University Strategic Plan 2021-2028. | December 2021 | Policy reviewed and signed off by VC<br><br>Enabling strategy developed and published. |
| 3. | Integrate Security, environmental compliance and business continuity into SHE Department business processes and IMS. | July 2021 | The 3 strands are successfully integrated and working effectively. |
| 4. | Allocation of sufficient resources to allow SHE to develop a University Business Continuity strategy and overarching plan, and to support schools and services develop their own business continuity plans. | July 2021 | Business Continuity strategy and overarching plan in place.<br><br>Schools and services developing their own business continuity plans. |
| 5. | Continued accreditation to ISO 45001/ 14001 at the Preston, Westlakes and Burnley Victoria Mill campuses through successful external audits of the SHE Integrated Management System. | February and July 2022 | Accreditation status continued |
| 6. | Areas of sustainable travel planning and other non-environmental compliance transferred to Estates Services under management of new Sustainability Manager. | December 2021 | Areas transferred |

**Safety Health & Environmental Compliance Department**
**October 2021**