

Research Safety Continuity Plan During Sabbatical Leave and Other Scheduled Leaves of Absence

Preamble and Intent

Conducting research and academic activities with safety as a priority is a core institutional value of the University of Michigan. Central to maintaining a safety-first culture is the active involvement and physical presence of faculty to ensure all day-to-day research and academic activities are conducted to the highest safety standards. Faculty are ultimately responsible for ensuring all members of their team conduct research and academic activities safely and a faculty member's physical presence on campus is critical for maintaining a proactive and resilient safety-first culture. The physical presence of faculty is central to many of the day-to-day elements of a safety-first culture include, but not limited to, the following:

- correcting deficiencies in a timely and sustainable manner;
- immediately correcting unsafety and unhealthful workplace conditions;
- being available to immediately respond to identified hazards or incidents;
- continually ensuring all team members abide by a safety-first culture and UM research safety guidelines;
- serving as a role model;
- ensuring students and staff are trained to conduct research and creative practice activities safely and understand the risks involved in the research;
- listening to and acting on safety concerns;
- reporting near misses and incidents; and
- establishing a learning culture wherein the faculty sets expectations for team members to make themselves aware of safety updates, learn from incidents and near misses, and openly discuss safety-related concerns and best practices.

To effectively perform these safety oversight responsibilities, faculty members whose research and creative practice programs involve activities having potential hazards to personnel and/or the environment that are inspected by EHS (e.g., research laboratories, shops, studios) are expected to be physically present on campus at least 2-3 days/week each week. Faculty who are planning a sabbatical or a scheduled leave of absence where they cannot meet this standard must identify a proxy and establish an approved safety oversight plan to ensure continuity of oversight while they are not physically on campus. ***This policy establishes a proxy-based system to ensure effective safety oversight remains ongoing while faculty who oversee research and creative practice activities involving hazards are not physically present in their assigned spaces (e.g., research laboratories, shops, studios) for extended periods of time, specifically for faculty sabbaticals and other scheduled leaves of absence.***

The intent of this appendix is to outline the process by which a proxy will be identified and act on behalf of a faculty member who is not physically present in their assigned spaces due to sabbaticals or other scheduled leaves of absence. The amount of safety oversight may vary among the units and may depend on the faculty's safety-compliance history, the nature and severity of hazards involved, and the size and composition of their research team.

Proxy-based Safety Oversight Plan

Faculty Responsibilities: In advance of a timeframe when a faculty member expects to be on sabbatical or other scheduled leave of absence, the faculty member must develop an effective

safety-oversight plan to manage their research and creative practice activities during such timeframe while not physically present. This plan must include (i) the naming of a faculty or a full-time/permanent staff member to serve as a proxy and (ii) proposing and documenting a plan that describes how the proxy will provide effective, ongoing oversight of research activities and the supervising of members of the research team. Students cannot serve as a proxy. The plan (see template) must include a description of research and creative practice activities and the major hazards and risks involved. For research and creative practice activities with more severe potential hazards, the faculty member and proxy must work with their EHS inspector to ensure the safety oversight plan is effective. ***The naming of a proxy does not abdicate the faculty member from their research and creative practice safety responsibilities.*** The faculty member is also responsible for ensuring the proxy is willing, available, knowledgeable, and empowered to effectively oversee safety to the highest standards. Further, the faculty member must ensure all members of their team are aware of the proxy's identity and their oversight responsibilities, and modify the emergency response information to reflect the change in oversight. The faculty member must replace the proxy or return onsite if the proxy is unwilling or otherwise unable to effectively implement the safety oversight plan. Once the safety-oversight plan is agreed upon, it must be signed by the faculty member and the chair/division chief to whom they report and the proxy and the chair/division chief to whom the proxy reports.

Proxy Responsibilities: The proxy must be willing, available, knowledgeable, and empowered to perform safety oversight effectively while the faculty member is not physically present in their assigned space due to a sabbatical or other scheduled leave of absence. The proxy must be broadly knowledgeable of safety and have an awareness and knowledge of the hazards specific to the faculty member's research and creative practice activities. The proxy must take additional training through EHS in the event they are not knowledgeable of the hazards specific to the faculty member's research and creative practice activities. The proxy must be available to the faculty, staff, and students comprising the faculty member's research team and able to correct deficiencies in a timely manner, ensure staff and students are trained, respond to safety inquiries, and maintain overall compliance with UM guidelines. The proxy must notify the faculty member in the event they are unavailable and/or no longer willing, able, or available to oversee safety.

Plan Oversight and Compliance: Plans and accompanying attestations must be signed by the faculty members, proxy, and (filed with their) department chair(s). These plans and attestations must be renewed annually if the duration of the sabbatical or scheduled leave of absence extends beyond 1 year. Approved plan submissions and attestations will be included in the sabbatical or leave of absence application and filed jointly with the department chair(s) and EHS. The existing resolution process for safety oversight will be used to ensure unit- and campus-wide compliance with establishing a proxy-based system when needed.

Coordination with Other Compliance Oversight Programs/Committees: In the safety-oversight template, the faculty member will include the types of research involved and the compliance oversight committees (e.g., research safety, human subjects, IBC, controlled substances, animal welfare). The faculty member must notify each compliance committee and provide them with a copy of the proxy-based oversight plan. Each compliance oversight committee has the responsibility to review and request revisions of the compliance protocols to ensure the research is conducted according to UM guidelines. Faculty members must initiate a plan well in advance to ensure the research is conducted according to UM guidelines. Faculty members must initiate a plan well in advance of an expected absence to ensure all stakeholders have had time to review and response to the proposed safety-oversight plan. Faculty must make themselves aware of funding sponsor requirements regarding the physical presence of faculty for overseeing research on campus. Once a plan is developed, the faculty and ORSP will propose the safety-oversight plan to a sponsor, as needed, in accordance with sponsor guidelines or policies.

FAQs

- **I conduct clinical research in the hospital; do I need to submit a safety-oversight plan?**
No, a safety-oversight plan is needed for faculty having programs in research and creative spaces that EHS inspects (e.g., research laboratories, shops, studios). However, we would recommend that you notify the IRB in advance of a sabbatical or leave of absence for their awareness.
- **I have a planned extended leave, when should I submit a safety-oversight plan?** To the extent possible, a plan should be initiated when the need for an extended leave is known. This will provide time to establish a proxy, ensure they are knowledgeable of the hazards involved in your research or creative practice, and all relevant compliance committees have had time to review your plan and ask for additional information, should that be necessary.
- **I plan to do my sabbatical on campus; do I need to submit a safety-oversight plan?** No, if you are on campus and plan to oversee safety in your research or creative space then answer “true” for questions 2 in the template.
- **A family emergency suddenly arose, and I must be out of state / country for many weeks. Can I submit a safety-oversight plan after leaving?** Yes, please submit a plan as soon as your situation allows.
- **I plan to work remotely and to be physically present in my assigned space a few days per month while on sabbatical, do I still need to establish a proxy-based safety oversight plan?**
Yes, faculty are expected to be physically in their assigned spaces 2-3 days/week each week consistently to oversee research and creative practice safety. Consistent oversight is important for a strong safety culture and even though the faculty may be present a few days, it is expected that this oversight be ongoing.
- **My proxy will take a paid 2-week vacation during the planned oversight period, what do I do?** Safety oversight is expected to be continuous to the extent possible. For a 2-week vacation, the faculty member may want to consider designating an alternative proxy or plan to come back onsite to ensure effective safety oversight.
- **The person most knowledgeable about the hazards in my research area works remotely (or another part of campus), can I use them as my proxy?** No, a key provision of the proxy is that they are physically present in or near your assigned space and that they are available to oversee safety.
- **My lab is run and managed by senior PhD students. Can one of them serve as proxy while I am out on sabbatical?** No, trainees cannot serve as safety-oversight proxies.