



**Research and Academic Safety Policy**

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This policy sets expectations for U-M’s safety culture in academic and research activities that involve potentially hazardous materials or equipment occurring in laboratories, creative spaces, shops, and studios affiliated with the Ann Arbor campus. The policy is issued by [Environment, Health & Safety \(EHS\)](#) in collaboration with the Executive Leadership Team (ELT) that oversees and provides direction for the Research Safety First Initiative. The ELT is comprised of the following: the Provost and Executive Vice President for Academic Affairs, the Executive Vice President and Chief Financial Officer, the Vice President for Research and Innovation, and the Executive Vice President for Medical Affairs. The policy is endorsed by the ELT and applies to all faculty, staff, students and visitors in university research and academic areas (research laboratories, teaching laboratories, shops, studios, etc.) as defined above or when conducting university related research and creative practice activities in other locations. This policy will be reviewed every three years to ensure any necessary changes are updated.

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## SUMMARY

The University of Michigan (U-M) is committed to:

- Ensuring safety is a core institutional value.
- Promoting a culture of safety among faculty, staff, students, and visitors.
- Providing a safe and healthy place to work, study, live, or visit.
- Protecting the natural environment.
- Complying with all applicable workplace safety, health, and environmental rules and regulations.

[Standard Practice Guide 605.01 Safety, Health and Environmental Policy](#) identifies the general responsibilities for various university groups for promoting a safe and legally compliant culture. The university's academic, research, clinical, and operations units will assess the safety and environmental impact of laboratory, academic, and creative practice projects and will implement strategies to reduce personal, infrastructure, and environmental risk. University units with specialized health and safety requirements for their operations, based upon federal, state, or other organizational rules, must develop specific policies and procedures that are consistent with SPG requirements and external legal obligations.

All faculty, staff, other employees, students, and visitors must be aware of the responsibilities outlined below and adhere to them while in university laboratories, creative practice spaces, shops, and studios or when conducting university research and academic activities regardless of location.

Although faculty are ultimately responsible for establishing a safe work environment and ensuring all team members always act in a safe manner, a strong culture of safety starts with understanding that safety is a shared responsibility. Everyone must understand and accept their responsibility for ensuring the well-being of themselves as well as those around them and the environment, enabling everyone to go home at the end of the day as healthy as when they arrived. To fulfill this commitment, all members of the U-M research community have the general responsibilities described below. For members of the U-M research and creative practice community, specific responsibilities that are part of their designated role, in addition to the general responsibilities below, are outlined in Appendices I and II. An individual's particular role in a research setting may vary and certain points listed below may not apply in their assigned role.

NOTE: In the cases of clinical research, there are additional safety needs that must be appropriately addressed. In addition to this policy, clinical research faculty and staff must also adhere to Michigan Medicine policies and procedures.

**GENERAL RESPONSIBILITIES** - These responsibilities are specific to research and creative practice activities and are in addition to the general responsibilities outlined in [SPG 605.01](#).

### **All faculty, staff, other employees, visitors, and students must:**

- Ensure that safety is a priority and a core value.
- Adhere to all department/division/laboratory/school/college (unit) rules and precautions about working alone, work environment, time at work, working or conducting academic activities offsite, and appropriate use of all safety equipment and supplies.
- Receive and understand safety training appropriate to their level of activity in the research laboratory and/or creative space. For anyone working in research, this includes the EHS Laboratory Safety Training Course and any additional training programs identified and provided by EHS, UMOR, or Unit for Laboratory Animal Medicine (ULAM) specific to actions being performed or materials being handled.

- Take responsibility for personal safety as well as the safety of others in the work area. Notify everyone in the immediate vicinity of hazardous situations or operations and follow all alarms, warnings, and directions from emergency management staff.

**Anyone in a management, supervisory, or mentorship role must:**

- Confirm that all appropriate steps are taken to ensure faculty, staff, students, and visitors comply with applicable safety requirements.
- Implement corrective and preventive actions in a timely manner as directed and ensure outcomes are effective and sustainable.
- Follow your unit's safety accountability plan for the appropriate escalation of issues that cannot be resolved locally.

## REPORTING AND RESOLVING HEALTH AND SAFETY ISSUES IN RESEARCH AND ACADEMIC LABORATORIES/SHOPS/STUDIOS:

### **Issue Identification and Resolution**

All faculty, staff, learners, and visitors share responsibility for identifying safety and environmental concerns in labs, shops, studios, and research or creative activities. The expectation is that any identified issue is immediately corrected if possible, or is corrected within a reasonable period of time or reported to those that can correct the issue in a timely manner. Items that require additional resources for correction should be elevated as appropriate within the unit. Units should follow their safety accountability plans and escalation procedures to ensure that deficiencies are corrected, including engaging with EHS when additional support or expertise is required.

**Emergency Situation:** In an **emergency situation**, defined as an injury requiring medical attention, fatality, environmental release, fire, or any situation involving potentially serious personal or infrastructure harm, dial 911 and identify what UM facility you are calling from. The appropriate emergency responders will contain and control the immediate situation and make the area safe for re-occupancy or make recommendations for any necessary long term follow up. EHS and DPSS will determine if there are immediate reporting requirements to federal or state agencies, and will notify the appropriate executive officers of the incident. The laboratory, studio, or shop director will follow their unit established reporting requirements.

**Non-Emergency Situation:** For any **non-emergency situation**, the concern should be reported to the laboratory, shop, or studio director who will in turn alert EHS to the matter by completing the [EHS Incident & Near Miss](#) form; however anyone has the option of contacting EHS directly at 734-647-1143 or through DPSS after hours at 734-763-1131. EHS staff will work with the laboratory, shop, or studio, to investigate the issue and identify corrective measures. Resolving the issue in a timely and sustainable manner is the responsibility of the faculty member in conjunction with their unit. The goal is to resolve the matter quickly and within the unit most directly affected; however matters may require escalation up to the facility manager, the department chair, the unit safety committee, the safety accountability lead, or up to the dean's office for assistance.

EHS in conjunction with the Research and Academic Safety Committee (RASC), will also report issues or raise questions to the appropriate administrative authority so that action can be taken to prevent or correct safety concerns. A notice for correction, with a timeline, when serious safety non-compliance is identified may be issued by EHS or the RASC. Units will be expected to follow their safety accountability plan for the resolution of issues and will respond to any questions raised by EHS or the RASC. The RASC will monitor the unit progress and will escalate the matter to higher administrative levels when corrections are not accomplished in a timely manner as outlined in the [Research and Academic Safety Resolution Policy](#), or when there is repeated failure to correct any

non-compliance or safety problems. All levels of the organization are expected to help resolve the safety issue.

**Near Miss:** Anytime there is a near miss in a laboratory, studio, or shop setting, there is a responsibility and an opportunity to learn and help prevent future incidents. The laboratory, studio, or shop director must complete and submit an [EHS Incident & Near Miss](#) form. This information is vital to help us continually improve the safety culture by sharing lessons learned to prevent future incident occurrence. The information provided will be also used by the unit safety committee and EHS to help improve safety systems and training opportunities – the intent of reporting incidents and near misses is to be informational, not punitive in nature.

### **Responsibility to Suspend Work**

Any faculty, staff, students, and/or visitors working in a research or academic laboratory, studio, or shop setting have the responsibility to suspend **their** work if they believe there is a safety or environmental issue that could cause personnel or infrastructure harm. The issue must be reported immediately to the laboratory, studio, or shop director or their delegate so that the issue can be quickly resolved and work can continue.

### **Authority to Stop Work**

Faculty and staff are empowered and obligated to stop activities that present an **immediate danger** to personnel, visitors, users, contractors, infrastructure, the public, or the environment. This authority is referred to as “stop-work authority.” Individuals who exercise “stop-work authority” are also obligated to immediately report this action to their laboratory, studio, or shop director, department chair, unit safety committee, and EHS. **Once work has been stopped, it may not resume until the laboratory/studio/shop director, unit safety committee, and EHS have verified that appropriate hazard control measures are in place.** The RASC should also be made aware of this issue and resolution.

In situations of serious or continued non-compliance with or violations of policies, rules, or regulations pertaining to research and academic safety, the appropriate authority may issue a “stop-work authority” order to a laboratory/studio/shop or research program until the issue is satisfactorily resolved. The authority can be a department chair, Safety Accountability lead, etc or as indicated in a unit safety accountability plan. If there is a dispute regarding the severity of the matter and need to stop work, the Assistant Vice President of EHS is the final authority.

### **Imminent hazard situation**

The Assistant Vice President of EHS, or designee, may issue an immediate Stop Work Order to the appropriate administrative authority in an imminent hazard situation that may cause death, serious injury, or significant harm to the environment or infrastructure if not immediately corrected. The Order must be adhered to by the faculty, staff, students, and visitors engaged in the unsafe situation. The Order may not be lifted until the concern(s) can be properly addressed, as verified by EHS.

### **Final Reporting/Closeout**

During the correction of safety or environmental issues, the laboratory, studio, or shop director is responsible for the process, working with EHS, the unit safety committee, and other unit individuals. Following completion of the actions, the laboratory, studio, or shop director must notify EHS that the corrective action is completed. EHS will review the corrective action and determine if additional actions are needed. EHS will determine if reporting to federal or state agencies is necessary and notify appropriate executive officers prior to filing the reports. EHS will then compile information regarding the issue and resolution, and report to the Research and Academic Safety Committee, which will in turn, determine the need to raise any issues/concerns to the executive officers.

### **Visits and Fines by Outside Agencies**

EHS should be contacted immediately if inspectors arrive at your work area or if you receive an inspection request from an outside agency related to safety, health or environmental issues. Under federal and state laws, government agencies have the authority to levy fines against the unit or

individuals within the unit for failure to follow appropriate laws and regulations. The unit responsible for the research will be responsible for paying the fines if they have not followed established precautions or clearly stated procedures.

## REFERENCES

- [SPG 605.01 Safety, Health and Environmental Policy](#)
- [SPG 601.24 U-M Business and Finance Authority Delegations](#)
- [SPG 303.3 Policy Statement on the Integrity of Scholarship and Procedures for Investigating Allegations of Misconduct in the Pursuit of Scholarship and Research](#)
- [U-M Medical School Office of Research](#)
- [U-M Environment, Health & Safety](#)

## APPENDICES

- I. Role-Specific Responsibilities for Individuals in Laboratory or Research Settings
- II. Role-Specific Responsibilities for Individuals and Groups in Administrative Roles
- III. Research Safety Continuity Plan During Sabbatical Leave and Other Scheduled Leave of Absence

APPENDIX I: ROLE-SPECIFIC RESPONSIBILITIES FOR INDIVIDUALS IN LABORATORY OR OTHER RESEARCH SETTINGS (Intended to be in addition to items listed under General Responsibilities.)

**Graduate Student Research Assistants/Trainees**

- Take initiative to engage in safety conversations with the laboratory, studio, or shop supervisor and EHS staff.
- Learn the standard operating procedures (SOPs), understand the risks, and understand the safety processes needed to minimize personal, infrastructure, or environmental harm.
- Report any missteps in research and creative space safety directly to the laboratory, studio or shop director for resolution and correction.
- Be professional, assertive, proactive, and equitable when evaluating and implementing safety practices.
- Suspend work if they believe there is an imminent safety or environmental issue or are uncertain about the standard operating procedures (SOPs).

**Post-Doctoral Trainee/Fellow**

- Take initiative to engage in safety conversations with the laboratory, studio, or shop supervisor and EHS staff.
- Learn the standard operating procedures (SOPs), understand the risks, and understand the safety processes needed to minimize personal, infrastructure, or environmental harm.
- Report any missteps in laboratory, studio, or shop safety directly to the laboratory, studio, or shop director for resolution and correction.
- Be professional, assertive, proactive, and equitable when evaluating and implementing safety practices.
- Suspend work if they believe there is an imminent safety or environmental issue or are uncertain about the standard operating procedures (SOPs).
- Oversee the safety of members of the research or academic groups that the postdoc is mentoring.
- Ensure that compliant safety practices are observed in all research and creative spaces where students and trainees do collaborative experiments and share resources.
- Reinforce the safety culture established by the director for the entire laboratory, studio, or shop. Contribute in a supporting role to assist the laboratory, studio, or shop director's responsibilities of recordkeeping regarding training requirements, identification and communication of potential hazards and emergency procedures, and oversight of the use of appropriate laboratory clothing and protective equipment (PPE).
- Engage in frequent communication across the entire laboratory, shop, or studio group to be certain there is a common understanding regarding regulations, compliance, policies, and best practices so that proactive considerations can be addressed with the laboratory, studio, or shop director. Postdocs who are involved in day-to-day management of laboratory, studio, or shop operations and other specific responsibilities must also assume laboratory, studio, or shop manager responsibilities listed below.

**Faculty or Staff with oversight responsibility in research, academic and creative spaces**

- The individual that leads activity in research, academic or creative spaces is ultimately accountable for all safety practices and compliance. This responsibility includes establishing and maintaining a safe work environment throughout the year, correcting unsafe conditions in a timely manner, and responding professionally to EHS inspections including the timely correction of any identified safety deficiency. While specific responsibilities and tasks may be delegated to other team members or departments, the authority to make final decisions and ensure adherence to safety standards resides solely with this individual. Responsibility may be assigned during

absences (see Appendix III), but the authority—and accountability—cannot be delegated. All safety concerns, incidents, and compliance issues must ultimately be reported to and resolved by this individual.

- Oversee the safety of all members of the research group, as well as individuals visiting the laboratories, studios, and/or shops, and ensure that best practices are observed. The laboratory, studio, or shop director must be vigilant to ensure that compliant safety practices are observed in all laboratories, studios, and/or shops where students and trainees do collaborative experiments and share resources.
- Ensure that all staff and students have completed basic university safety training requirements before participating in laboratory, shop or studio activities. Ensure that all staff and students are further trained to a proficiency level for the activities specific to their laboratory, shop or studio. Ensure that staff and students who fail to achieve this level of training are prevented from conducting such activities.
- Ensure SOPs include hazard risks and safety mitigation processes.
- Receive reports of and respond to any missteps in laboratory or creative space safety and ensure resolution and correction.
- Suspend work if they believe there is an imminent safety, infrastructure, or environmental issue.
- Notify both EHS and the unit safety committee of potential safety hazards, exposures, accidents, injuries, illnesses, spills, releases, near misses, or other regulatory and environmental issues.
- Identify potential hazards, emergency procedures, and proper protective equipment; ensuring its use as common practice.
- Ensure that accurate records are kept to validate completion of appropriate training.
- Set the tone for health and safety practices in the classroom and laboratory and/or creative spaces, and report to supervisors or instructors any potentially unsafe practices or serious hazards.
- Engage in frequent communication with the entire laboratory, studio, or shop group to be certain there is a common understanding of regulations, compliance, policies, and best practices.
- Communicate on behalf of the laboratory, studio and/or shop with directors, deans, and compliance officers within the University about safety policies and practices.
- Respond in a timely manner to all reports of failures of individuals to adhere to safety or regulatory requirements.
- Escalate any issues that are not able to be resolved according to your unit's safety accountability plan.

### **Department Chair**

- Ensure timely actions are taken by the laboratory, studio, and/or shop to protect personnel and facilities and to remain in compliance with all applicable codes and regulations. Follow your unit's safety accountability plan for appropriate steps for resolution and escalation of issues.
- Set a positive example for safety by modeling established safe work practices, by implementing corrective actions brought to their attention by a laboratory, studio, or shop, EHS, or a safety oversight committee, and by having an unbiased consideration for all safety questions or concerns raised by those working in a laboratory, shop, or studio.
- Ensure the department communicates key safety priorities by promoting ongoing safety messaging or preparing an annual safety message
- Ensure all new research and laboratory/shop/studio processes are evaluated and approved for possible safety and environmental issues in order to mitigate those issues before initiation.
- Notify EHS upon the arrival of new faculty and when faculty depart.
- Adhere to the EHS procedures for the commissioning ([Laboratory Commissioning Guideline](#)) or decommissioning ([Laboratory Decommissioning Guideline](#)) of laboratory spaces to ensure safety and environmental measures are in place, or to ensure hazards are removed when an operation ends.
- Establish and promote department safety mechanisms as warranted by the size or complexity of the department, and assign unit-level safety coordinators with authority to correct or elevate safety matters as defined in your unit's safety accountability plan to help drive safety through the organization, while addressing concerns quickly and effectively.

- Respond in a timely manner, as outlined in the [Research and Academic Safety Resolution Policy](#), to all reports of failures of individuals to adhere to safety and regulatory requirements.
- Ensure faculty are physically present in their laboratory, shop or studio to effectively oversee safety. In the event of faculty absences, ensure faculty abide by the safety continuity plan as described in Appendix III. In the event of faculty departure from the university, ensure there is effective oversight of any remaining activities occurring in the laboratory, shop or studio.

## APPENDIX II: ROLE-SPECIFIC RESPONSIBILITIES FOR INDIVIDUALS AND GROUPS IN ADMINISTRATIVE ROLES

### **Safety Accountability Leads (Individual appointed by Dean or Director)**

- Serve as the main contact for the unit's safety accountability plan.
- Ensure oversight of the implementation of the Research Safety First Initiative for their unit.
- Administer an effective unit safety committee with ongoing review of performance.
- Coordinate and engage with the unit safety committee chair (USCC) on priorities of the safety initiative to ensure planning and resources are in place as needed. This requires integration of the plans to meet the unique needs of the specific school or college as well as stakeholder engagement to increase buy-in at the unit level.
- Ensure there is an adequate mechanism in place for safety concerns or suggestions to be reported locally and that this is known to your community.
- Promote professionalism in the workplace into unit activities (promotions, reviews, and faculty development) that include safety as a key element.
- Monitor quarterly unit safety dashboard reports provided by EHS and develop action plans to move their unit toward a sustainable inspection-ready safety culture.
- Resolve issues that the unit safety committee brings per the safety accountability plan non-compliance process.
- Work with the RASC to promote campus-wide consistency with safety requirements, including consequences for unresolved issues.
- Engage with the RASC as needed to resolve issues or discuss ways to enhance safety across campus.
- Coordinate root cause investigations for incidents and near misses that are deemed to be significant per the [Research and Academic Safety Incident Review Protocol](#).

### **Facility Managers/Department Managers/Key Administrators/Chief Department Administrators**

- Maintain an understanding of requirements for research and academic safety.
- Complete training recommended by EHS for general knowledge of research and academic safety compliance. Refer to the [U-M Chemical Hygiene Plan](#) for more information on training.
- Assist the laboratory, studio, and/or shop director with accomplishing corrective actions, maintenance, repair, or renovation procedures to correct infrastructure issues that impact safety or environmental compliance in the research areas.
- Ensure adequate security measures are in place to meet federal security requirements on select research materials or operations.
- Adhere to the EHS procedures for the commissioning ([Laboratory Commissioning Guideline](#)) or decommissioning ([Laboratory Decommissioning Guideline](#)) of laboratory spaces to ensure safety and environmental measures are in place, or to ensure hazards are removed when an operation ends.
- Ensure facility-related equipment is available and upgraded during renovation and commissioning activities
- Respond in a timely manner, as outlined in the [Research and Academic Safety Resolution Policy](#), to all reports of failures of individuals to adhere to safety or regulatory requirements.

### **Unit (School/College/Department) Safety Coordinators**

- Act as safety liaison and assume the authority delegated by the dean or chair (or within your unit's safety accountability plan) to manage and resolve safety or environmental issues that arise during operations.
- Disseminate all safety and environmental information to appropriate personnel in the department. This may be educational material, posters, signage, or specific changes in safety or environmental rules or practices.
- Work with research faculty and staff in resolving questions or raising concerns to appropriate authorities.
- Notify both the unit safety committee and EHS of potential safety hazards, exposures, accidents, injuries, illnesses, spills, releases, near misses, or other regulatory and environmental issues.
- Attend Safety Coordinator Meetings and any other training recommended by EHS or safety oversight committees.
- Respond in a timely manner to all reports of failures of individuals to adhere to safety or regulatory requirements.

### **Unit (School/College/Department) Safety Committees**

- Coordinate and engage with unit safety accountability lead (SAL) on priorities of the Research Safety First initiative to ensure planning and resources are in place as needed. This requires integration of the plans to meet the unique needs of the specific school or college as well as stakeholder engagement to increase buy-in at the unit level.
- Monitor quarterly unit dashboard reports provided by EHS and develop action plans to move their unit toward a sustainable inspection-ready safety culture.
- Resolve issues that arise per the safety accountability plan non-compliance process.
- Promote safety and make appropriate recommendations regarding research and academic operations specific to their unit or community members.
- Review incident reports and near miss reports in a timely manner, as outlined in the [Research and Academic Safety Resolution Policy](#), and make appropriate safety recommendations to the laboratory, studio, and/or shop director, and department chair.
- Work with EHS and the RASC to promote safe and healthy work practices within the unit. This could include hosting focus groups, town halls or sending out directed communications to address a specific issue or to enhance our safety culture overall. This may include setting priorities and goals based on current trends and analysis of a unit's activity in regard to deficiencies or incidents in the unit.
- Set a positive example for safety by modeling established safe work practices, encouraging the reporting of concerns and near misses, implementing corrective actions brought to their attention by EHS or a safety oversight committee, and having an unbiased consideration for all safety questions or concerns raised by those working in the laboratory, studio, and/or shop.
- Bring issues to an appropriate University safety oversight committee for discussion and/or assistance.

### **Research and Academic Safety Committee (RASC)**

- Responsible for enhancing the safety culture in research and creative spaces with activities that involve potentially hazardous materials or equipment, occurring in laboratories, shops, or studios affiliated with the Ann Arbor campus.
- Establishing accountability processes for each unit across campus and a culture of "safety first, safety everyday" where safety is a part of everything we do.
- Monitor compliance with rules and regulations applicable to various types of research conducted at U-M and liaise with the unit safety committees focused on research and academic safety.

- Function in a similar way as other university research oversight committees, such as the Institutional Biosafety Committee, Institutional Review Boards, Radiation Policy Committee, Institutional Animal Care and Use Committee, and the Controlled Substances in Research Review Committee.
- Strive to ensure consistency in approach and programming to enhance the culture of safety on campus.
- Refer to the [Research and Academic Safety Committee Charter](#) for further detail.

### **Deans, Research Associate Deans, and Directors**

- Appoint a safety accountability lead (SAL) for your unit to serve as the main contact for the unit's safety accountability plan (SAP) and to ensure oversight of the implementation of the research safety first initiative for their unit.
- Endorse your unit's safety accountability plan.
- Ensure the unit communicates key safety priorities by promoting ongoing safety messaging or preparing an annual safety message
- Recognize and promote sound safety and environmental practices to set a positive tone for faculty, staff, and students to follow.
- Take appropriate steps to create a culture that supports reporting issues in an environment free of reprisal.
- Serve as role models and lead by example to demonstrate that safety and environmental protection are important facets of all university operations.
- Provide support for mitigating risks to provide a safe and compliant work environment.
- Empower unit safety committees and safety coordinators with authority to correct or elevate safety matters before they become major problems.
- Act to correct safety or regulatory deficiencies when brought to their attention.
- Report to the senior leadership on issues related to research and academic safety as appropriate.

### **Executive Leadership Team and Executive Steering Committee**

The following areas comprise the ELT and ESC and provide leadership direction and guidance to the Research and Academic Safety Committee on efforts to enhance our campus culture:

- Office of the Provost and Executive Vice President for Academic Affairs,
- Office of the Executive Vice President and Chief Financial Officer
- Office of the Vice President for Research
- Office of the Executive Vice President for Medical Affairs.
- Ensure research and academic safety remains an institutional core value.
- Receive and analyze reports and recommendations from EHS and the RASC regarding research and academic safety.
- Secure resources necessary to ensure optimal functioning of departments charged with health, safety, and regulatory compliance, such as EHS, U-M Office of Research, and committees charged with oversight of research and academic safety.
- Serve as role models and lead by example to ensure that the culture of research and academic safety permeates all facets of the university environment.
- Communicate an annual safety message to the campus community to reinforce safety culture highlight key safety priorities and updates

## APPENDIX III: RESEARCH SAFETY CONTINUITY PLAN DURING FACULTY 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 including, but not limited to, the following:

- correcting deficiencies in a timely and sustainable manner;
- immediately correcting unsafe 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 U-M 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. For example, 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.***

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 for extended periods of time. 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 planning for an absence of extended duration, faculty members must develop an effective safety-oversight plan to manage their research and creative practice activities while they are 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 established, 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 an absence of extended duration. 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 as needed. 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 member, proxy, and department chair(s) of the faculty and proxy. These plans and attestations must be renewed annually if the duration of the absence extends beyond one (1) year. Approved plan submissions and attestations should be submitted with any absence-related paperwork and filed jointly with the department chair(s) and submitted to the appropriate campus-unit (e.g., Provost office in the case of sabbaticals). 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 overseeing their research and academic activities (e.g., research safety, human subjects, IBC, controlled substances, animal welfare, etc.). 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 U-M guidelines while the faculty is absent and a proxy is in place. Faculty members must initiate a plan well in advance of an expected absence to ensure all stakeholders have had time to review and respond to the proposed safety-oversight plan to ensure effectiveness. 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 share the safety-oversight plan with a sponsor, as needed, in accordance with sponsor guidelines or policies.