Dear UCU,

Thank you for taking the time to carry out an inspection of LAWPL. We are hopeful that we can work together to further improve our approach to the management of work-related stress.

The picture painted by the inspection report does not reflect the working environment which we are striving to create and we take seriously our commitment to ‘continually reviewing and enhancing our wellbeing initiatives and support to colleagues, equipping them with the understanding, skills and working environment in order to provide the best possible workplace experiences for all’.

Whilst the University does not recognise many of the findings detailed in the inspection report from its own audits and, it has unfortunately not been possible to view the evidence behind the findings, it is recognised that work-related stress is a nuanced and complex area and one which, as a University, we are committed to addressing. The recommendations outlined in the report provide areas that need to be further explored, something the University is committed to working with UCU to do.

Below are the University’s responses to the recommendations raised in the report.

* *Develop and adopt a proactive and* ***preventative*** *approach to dealing with work-related stress – i.e. have mechanisms in place to stop staff getting to the point where they are overburdened and need time off for stress. This can include appropriate planning and monitoring of student numbers or other relevant factors that will impact on staff workloads. Regarding WAM, discuss teaching in advance and publish WAM before the start of the academic year.*
  + The University outlined the proactive and preventive controls in place for managing work-related stress (please see the response to the RAG assessment).
  + The University is committed to developing an organisational stress risk assessment (OSRA) and, once complete, working with key Schools to pilot its implementation before reviewing the Stress Management Policy accordingly. The University would welcome the support of UCU in developing and publicising the OSRA.
  + In addition, the School will undertake the following:
    - ensure staff are aware that all roles are documented and available to view on the School’s Teams channel for review as necessary to support staff with clarity on roles within the School
    - ensure the role of the academic line manager is clarified, with support of College HR.
    - Work with staff and UCU to understand staff concerns about the provision of reasonable adjustments. The University is dedicated to creating an inclusive environment where staff feel valued and the School have a robust approach in place to support those with disability and long term health issues. Further details are available at [Reasonable adjustments - Intranet - Cardiff University](https://intranet.cardiff.ac.uk/staff/wellbeing-and-support/disability-support/reasonable-adjustments)).
* *Use existing instruments to monitor, control, reduce and prevent workplace stress (Cardiff University policies already contain processes and procedures that can control and reduce work-related stress. For reasons which this H&S inspection could not establish due to a lack of responsiveness from those with responsibilities, these processes and procedures are not applied. Specifically, the Workload Modelling Policy prescribes the School-level analysis of any workload issues as well as the development of an action plan. The Stress Management Policy prescribes that any incident of workplace stress should result in a co-produced Stress Action Plan that is adequately resourced.* 
  + The University is committed to monitoring workplace stress in order to inform the risk assessment. The University already use OH figures, EAP figures and has recently updated its sickness absence codes to allow differentiation between work-related stress and personal stress.
  + In addition, personal stress risk assessments are co-produced with staff experiencing stress and as stated above, the University is committed to developing an organisational stress risk assessment and, once complete, working with key Schools to pilot its implementation before reviewing the Stress Management Policy accordingly.
  + The Workload Policy is scheduled for review, in the meantime the University is committed to working with the School to review operational issues and identify standard and consistent implementation of the workload allocation process to ensure it is deliverable and sustainable.
* *A stress risk assessment for the School’s growth plan must be carried out to identify the stressors and hazards that these changes may have, and suggest mitigations. LAWPL staff we spoke to had many recommendations for improvements that we can provide.*
  + As above, the University is committed to developing an organisational stress risk assessment and, once complete, working with key Schools to pilot its implementation.
  + We would appreciate UCU providing the School / College with the practical suggestions from LAWPL staff referred to so that these can be reviewed and considered.
* *In general, stress risk assessments must be conducted for all organisational changes (for example, the recent timetabling changes were mentioned by multiple staff we spoke to as causing considerable stress).*
  + As above, the University is committed to developing an organisational stress risk assessment and, once complete, working with key Schools to pilot its implementation. The OSRA considers change as one of the 6 key areas of the HSE Management Standard.
* *In the absence of resources to increase capacity in LAWPL (and beyond), develop a clear plan which non-essential processes and procedures to pause or stop entirely in case significant work-related stress is discovered in an organisational unit. University and College senior management should be aware of resource issues in the school and urgently propose an action plan. The communication regarding those challenges should not be filtered at the school/college level and should be openly discussed with UEB and staff. Without a plan in place and changes made, our concern is that staff will ‘burn out’ and experience further risks to their health.*
  + The AHSS College SHEW Committee has previously raised concerns about stress at the HSW Committee resulting in additional resource being put into a number of Education offices. It is anticipated that workload will be further alleviated by a key focus on systemic procedural changes via the TOM. Workload allocation policies and practices are to be simplified and streamlined for both Professional Services and Academic staff.
  + We would appreciate UCU providing the School / College with details of any “non-essential processes and procedures” referred to by LAWPL staff during the inspection so that these can be reviewed and considered.
  + Heads of School, supported by Boards of Studies, are encouraged to support changing ways of working and delivering teaching and research at School and unit level. Where workload has accumulated over time, the School has agency to review and remove workload where it no longer necessary.
* *Urgently and then regularly conduct a full HSE Stress Indicator Survey across the whole university to identify problem areas and work to understand and alleviate them.*
  + The University already undertakes a regular staff survey which provides data which can be used to inform stress management, as such investment in the HSE Stress Indicator Survey is not necessary at present.
* *Urgently perform an equality assessment which includes an assessment of the way workload is formally distributed and analysis of staff turnover in LAWPL*
  + College HR to
    - Review how workload is formally distributed to identify any inequalities in distribution for the current year
    - review School’s leavers’ data over past last 2 years.

If the data identifies inequality in workload distribution, College HR to review exit survey information, and then work with the School and EDI Hub (as appropriate) to understand any themes identified and determine potential actions to address these.

* *Urgently review existing RAs and revise actions and control measures in line with a realistic assessment of these (e.g. planned workloads and WAM do not have a preventative function within LAWPL and should therefore not be referenced in this way).* 
  + The LAWPL Risk Assessments have been reviewed and updated in April 2024.
  + The University is committed to developing an organisational stress risk assessment and, once complete, working with key Schools to pilot its implementation before reviewing the Stress Management Policy accordingly. The University would welcome the support of UCU in publicising the OSRA.
* *Use a variety of data sources (e.g. staff survey, WAM, committee meeting minutes (e.g. SMT, Teaching and Learning, Research)) in addition to sickness absence data and referrals for stress when monitoring and assessing the issue. As our inspection shows, staff feel that taking time off or raising stress formally is a last resort and not something most are prepared to do, which means sickness absence statistics are not a reliable indicator for workplace stress.* 
  + The School (supported by College HR) will work with staff to understand how to support them in talking about incidences of stress or (where appropriate) taking time off resulting from stress (this is to address the suggestion in the inspection report that “Staff do not report work-related stress and are unwilling to take time off due to perceived negative consequences for themselves and their colleagues.” **Please note** Management referral data for the School identified 5 referrals to occupational health in the last 14 months due to work related stress/personal stress/depression. In addition, sickness absence data identifies 13 stress related absences (stress - personal/stress – work related) in the 12 months prior to the end of July 2023 and 9 cases of mental health absence (anxiety/stress - personal/stress – work related) between August 23 and January 24. All of which suggests there are staff reporting cases of stress and willing to take time off).
  + To complement the work to understand how to support staff to talk about incidence of stress and/or feel comfortable taking time off (as well as the work to clarify the role of the academic line manager), the School (supported by College HR) will ensure line managers have the appropriate training.