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For the attention of the Vice-Chancellor and Principal Vice Chancellors Office

Dear Professor Adam Tickell

Health and Safety at Work etc. Act 1974

On 12th June 2025 and 3rd, 4th and 5th September 2025, HSE colleagues and I met with yourself, Professor Nick Vaughan-Williams (Provost and Vice Principal) Andrew Page (HR Director) and various employees across a range of roles and levels within the University of Birmingham to inspect your organisation's arrangements for managing work-related stress. We also completed a comprehensive review of various documentation on work-related stress, including policies, risk assessments and sickness absence data. The information obtained during both the document review and the interviews (including 24 focus groups) provided us with the evidence on which my opinions are based.

During the inspection, contraventions of health and safety law were identified:

- **The contraventions (material breaches) are outlined on Pages 2 & 3 of this letter including the reasons why that opinion has been formed.**
- **The actions you need to take to comply with the regulations are on Page 4, including the dates for compliance.**
- **Advice on compliance with other relevant health and safety legislation is on Page 5.**

It is important that you deal with these matters to protect people's health and safety. If you do not understand what action to take then please contact me or my Head of Operations, Harvey Wild and we will explain further. You will have to pay a fee because I have identified contraventions of health and safety law which are material breaches. The enclosed section on Fee for Intervention provides further information.

Section 28(8) of the Health and Safety at Work etc Act 1974 requires me to inform your employees about matters affecting their health and safety. A copy of this letter will be shared with the relevant Unions. You should also ensure that a copy is provided to your employees.

Yours sincerely



Jenny Skeldon (HM Principal Inspector of Health and Safety)

MATERIAL BREACHES

The Management of Health and Safety at Work Regulations 1999, Regulations 3, 4 and 5

The above regulations require that you:

- make a suitable and sufficient assessment of the risks to the health and safety of your employees to which they are exposed whilst they are at work; and,
- implement preventive and protective measures to control the risks identified by the risk assessment; and,
- have arrangements in place as are appropriate, having regard to the nature of your activities and the size of your undertaking, for the effective planning, organisation, control, monitoring and review of the preventive and protective measures

The University does not have appropriate arrangements in place for managing work-related stress, given the nature and size of your undertaking and referring to the 'states to be achieved' within HSE's Management Standards. The measures currently in place are ineffective at identifying, preventing and controlling the causes of work-related stress. In addition, the University does not have effective systems for monitoring and review of the measures in place currently.

The reasons for my opinion are summarised in the following four conclusions:

1.The University has failed to fully implement the Stress Management Policy, which sets out the existing arrangements and responsibilities for stress management.

- Stress risk assessments are not completed at college or school level as stated in the stress management policy.
- There were varying levels of understanding of individual roles and responsibilities in relation to management of work-related stress.
- There were inconsistencies regarding the training provided to those who are responsible for carrying out risk assessments.
- Action plans are generated in colleges and schools from the results of staff surveys. However, the action plans do not go into sufficient detail about control measures. For example, where it has been identified that workload is a factor, there is no assessment of what else can be done to reduce workloads. Some of the actions identified in the action plans do not appear to have been implemented, such as, workload frameworks and allocation criteria, regular reviews and consultation with employees.

2.The organisational stress risk assessment fails to identify the key risks and control measures required to prevent work related stress sufficiently.

- The University has concluded that work-related stress is not a significant issue for the organisation using a variety of data, including sickness absence results, referrals to Occupational Health and access to the employee assistance programme (EAP). The analysis of this data is completed in isolation of other information sources, such as reports of local level stress incidents.
- The stress risk assessment does not identify hot spots, including particular job roles that may be at higher risk or priority areas.
- The stress risk assessment is too generic to consider key stressors associated with specific areas of the organisation and different roles, despite having varying work-related pressures. It was clear that pressures placed on academic staff differed significantly when compared to other roles, particularly in relation to demands of the role and workloads.
- You have not involved your employees in the development of the organisational risk assessment or in determining how to address the failures in current performance. Employees and their representatives are the ones closest to the issues and often best placed to suggest improvements - involving them in discussions can be key to managing risks effectively.

3.The controls identified in the risk assessment are not adequate to reduce the risk of workers experiencing work-related stress.

- Control measures identified are not being implemented - for example, whilst one of the measures was stated as the working time employee guidance which sets out working hours, this is not reflective of the actual hours some employees, particularly academics, are routinely working.
- Control measures identified, include 'regular' one to one meetings with line managers, but there is no system in place that states how often this should be carried out and no structure to follow to ensure a suitable discussion about work-related stress is covered.
- Control measures identified include review of work allocation model to ensure they are used correctly and ensure that there is sufficient time to achieve what is expected, however, academics indicate they are working excessive hours, often during evenings and weekends to fulfil the demands of their role.
- Control measures identified include processes and procedures in place for unfilled vacancies and the provision of temporary cover. Many of those interviewed were either unaware of these procedures and referred to difficulties filling vacancies and obtaining temporary cover for example where staff are on maternity leave.
- Work-related stress training is identified as a control measure but there is no detail on who attends, how this is managed or the monitoring arrangements in place to ensure relevant line managers have received the training.
- The risk assessment refers to annual review of the ratio of students to staff as part of the work planning process, however, the student staff ratio was identified as a stressor in many of the interviews undertaken.

4.No effective monitoring and review systems in place to check controls identified for managing work related stress are suitable.

- Completion of work-related stress training for line managers to assist with recognising symptoms is inconsistent and there is no system in place to manage, review and monitor if the training is attended by all line managers.
- The work allocation model is used as a tool to manage work tasks for academic staff but it is not used for all roles and staff are routinely working additional hours to complete work required, including evenings and weekends - there are no measures in place to monitor its effectiveness.
- Workers (including unions) have not been involved in developing solutions for reducing workload and working excessive hours.
- There is no formal structure in place for line managers to report cases of work-related stress centrally, even when they are identified locally, for example, where employees remain in work but indicate that they may be experiencing symptoms of work-related stress. Therefore, the University does not have a complete understanding of the risk and where it may have high risk areas.
- There is no worker consultation to assist with managing and measuring health and safety performance in relation to work-related stress.

Overall, there are clear and significant inconsistencies in your management arrangements and control measures for work-related stress.

The lack of consultation and information gathering means you cannot demonstrate sufficient understanding of the risk to your staff from work-related stress in your business and, therefore, you cannot assess the effectiveness of your current control measures to ensure the risk is being appropriately managed.

As a result, it is my opinion that you do not have effective arrangements in place to manage the risk from work-related stress across the University.

ACTION REQUIRED

To comply with the above regulations, you need to:

- a) Carry out a review of your current management arrangements to ensure that you are capturing the full extent of ill health caused by work-related stress within your organisation. This should include a more detailed analysis of your data sources and setting up a system for capturing cases where work-related stress is identified at a local level.
- b) Review your current organisational stress management policy to ensure that it is suitable and that it is being implemented. Where it is not, you should put measures in place to ensure its effectiveness.
- c) Review your organisational stress risk assessment and assess if the current controls are suitable and sufficient and identify if further measures are required to control the risk.
- d) Develop risk assessments at college level, initially focusing on the College of Medicine and Health and the College of Arts and Law, specifically assessing risk in relation to 'demands', 'control' and 'support' as described in HSE's Management Standards approach (or implement any other measures that are equally effective).
- e) Set up an effective monitoring and reviewing system to check that the arrangements you have in place to manage work-related stress are suitable. These checks will enable you to ensure that preventive and protective measures in place are effective.
- f) All of the above points include involving and consulting with your employees and you should demonstrate how this is being achieved e.g. setting up steering/focus groups which cover a wide and representative range of employee's.

Please provide me with your timebound plan for the actions necessary to comply with the above regulations by **28th January 2026**. Your timebound plan will need to provide sufficient detail, including assigned roles and responsibilities, of how you plan to ensure the above points a-f. are completed in order to demonstrate compliance.

The action plan will need to include how you intend to regularly monitor progress and you should aim to ensure that all actions have been completed by **30th September 2026** where a full update should then be provided to HSE to assess compliance.

Based on your response and progress in relation to the management of work-related stress, further consideration may be given to whether further intervention is required.

Guidance to assist you can be found at: [Stress and mental health at work - HSE](#)

ADVICE

The inspection approach undertaken focused on work-related stress. During the inspection consultation with employees and the number of hours being worked by some employees were identified as areas of concern. There are specific legal requirements in relation to these matters but as these were not the focus of this intervention, we would have needed significantly more time to inspect these matters to establish if there were specific contraventions or not. As a result, we are raising the following advisory matters that you should ensure you are complying with. They may be followed up in the future.

The Safety Representatives and Safety Committees Regulations 1977 (as amended), and the Health and Safety (Consultation with Employees) Regulations 1996 (as amended).

Communication and consultation are the most basic forms of employee involvement in health and safety management. It is crucial that you get them right, because they form the foundation for fully engaging your workforce to achieve the type of changes in behaviour in managers and employees that will lead to safer and healthier workplaces. Whilst you do have some mechanisms in place to consult with your employees, there did not appear to be a culture of collaboration where concerns, ideas and solutions are freely shared and acted upon, and where the whole workforce is engaged in promoting a healthy and safe environment. Particularly in relation to managing work-related stress where employees felt that they had no involvement in developing and shaping policies and procedures and identifying solutions to control the risks. You should ensure that you have suitable arrangement in place to meet these specific legal requirements where they apply.

Guidance to assist you can be found at: [Involving your workforce in health and safety - HSE](#)

The Working Time Regulations (1998)

An employer shall take all reasonable steps, in keeping with the need to protect the health and safety of workers, to ensure that employees are not exceeding the maximum working time limits. Various employees interviewed, particularly academic employees, highlighted that they were working excessive hours, including evening and weekends. You should therefore ensure that you have a suitable system in place to satisfy yourself that the working time limits are not being exceeded.

Guidance to assist you can be found at: [The Working Time Regulations](#)