



**Terms and Conditions of
Employment**

Grades 6 to 10

ROYALHOLLOWAY
University of London

**TERMS AND CONDITIONS OF EMPLOYMENT FOR STAFF IN
GRADES 6 – 10**

GENERAL

1. The purpose of this document is to set out the basic terms and conditions under which members of the College Staff in Grades 6 to 10 are employed by the Council of the College (hereafter called “the College”). Together with your letter of appointment, job description or task list, the provision of any collective agreements made between the Council and recognised trade union, and appropriate College Statutes and Regulations, it forms your contract of employment with the College.

DUTIES

2. The main duties of your post are specified in your job description, or role profile and task list. These documents will be reviewed annually, and revised if necessary.

PROBATION

3. Your first year of service will be probationary. Any variation from this will be detailed in your letter of appointment.
4. Probation is managed in accordance with the Probationary Guidelines. Full details of these are available at:

<https://www.royalholloway.ac.uk/iquad/collegepolicies/documents/pdf/humanresources/probationaryguidancenonac.pdf>

The probationary period may be extended or your appointment terminated if your performance during the first year is not considered to be satisfactory.

HOURS OF WORK AND OUTSIDE WORK

5. There are no specified hours of work, but your appointment is full time unless otherwise stated in your letter of appointment. A notional 35 hours per week is used as a reference for calculating pro-rata hours as appropriate. The standard working week is Monday to Friday unless otherwise agreed at appointment or with your Head of Department.
6. Within the requirements of the Working Time Regulations (or prevailing legislation), you may undertake paid work for another employer outside of your College working time. You must get your Head of Department’s permission before taking additional work and must ensure that it does not interfere with your College duties.

7. Any consultancy work arising as a result of your employment by the College must be undertaken in accordance with the terms of the College's Consultancy Policy which is available at

<https://www.royalholloway.ac.uk/iquad/documents/pdf/researchsupport/consultancy-policyv2.pdf>

8. Occasionally, staff in Grades 6 to 10 will by mutual agreement in advance be required to attend College for events or other agreed work on a Saturday or Sunday (or day 6 or 7). In these instances, and with the prior agreement of your Head of Department, you will be entitled to time off in lieu as compensation. In exceptional circumstances, and with prior agreement of the Director of HR, arrangements can be made for overtime worked on days 6 and 7 to be compensated by payment appropriate to the allowance for time off in lieu.

SALARY

9. Your salary and grade will be specified in the letter of appointment and notified in writing thereafter.
10. The annual incremental date is 1st August for staff on an incremental scale and in post on 31st January. The date on which your first increment is due will be specified in your letter of appointment.
11. Staff automatically move up one incremental point every year until they reach the top non-contribution point of their grade. The current RHUL single pay spine is available at:

<https://www.royalholloway.ac.uk/iquad/documents/pdf/humanresourcespdf/payanddsalaryscales/rhulpayandgradingstructurepointstogradematrix.pdf>

12. The College will operate a fair and transparent process with clearly defined and applied criteria which will be implemented for the award of accelerated incrementation within the main scale, and the award of contribution points.
13. Salaries are payable monthly in arrears, no later than 27th of the month, by credit transfer.
14. The RHUL salary scale is determined by collective agreement with the trades unions recognised by the College. Cost of living awards are determined by collective agreement between the Universities and Colleges Employers Association, acting on behalf of the College, and the nationally recognised trades unions.

DEDUCTIONS FROM PAY

15. The College may recover any overpayment of salary or expenses incurred. Examples of these include an overpayment due to a miscalculation or managerial error or due to excess annual leave taken at the date of termination. The terms of any repayment will be agreed in consultation with the employee concerned, including the option to have the payment scheduled across a number of months and years.

HOLIDAYS

16. You are entitled to 27 working days paid holiday a year (189 hours). Annual leave is pro-rated for part time staff. You are also entitled to 8 statutory public holidays and, at the College's discretion, an additional 6 days holiday, shared between Easter and Christmas, when the College is closed.
17. The holiday year runs from 1st August to 31st July. Outstanding leave can only be carried over from one holiday year to the next in exceptional circumstances and only with the agreement of your Head of Department.
18. All leave must be agreed in advance with your line manager in accordance with local departmental rules and within the terms of the Working Time Regulations (or prevailing legislation). Leave will only be approved according to the requirements of the service.

PENSIONS

19. You are entitled to join the occupational pension scheme for staff in Grades 6 to 10 which is the Universities Superannuation Scheme (USS). The College operates SmartPension which is a salary sacrifice scheme. You will be automatically entered into USS and SmartPension unless the College considers you may not benefit from participation in SmartPension or you elect otherwise in writing. If you elect to join USS and opt out of SmartPension you will be required to contribute to USS according to the rules of the scheme, and the College will contribute an additional sum in order to finance the benefits of the scheme. If you have elected to remain in SmartPension you will sacrifice an amount from your salary equivalent to the amount of money that you currently pay into USS. The College will then make a contribution equal to the amount of salary you have sacrificed plus the employer pension contribution.
20. Your attention is drawn to the provisions of the Rules of USS and SmartPension which are available at
<https://www.royalholloway.ac.uk/restricted/contensis/finance/documents/pdf/smartpension-booklet-april-2016.pdf>
This booklet also explains about electing not to join, leaving and rejoining the scheme.

TERMINATION OF EMPLOYMENT

21. You may terminate your employment by giving three months' notice in writing to your Head of Department.
22. The College is required to give you three months' written notice of termination of employment.

ABSENCE THROUGH SICKNESS

23. If you are unable to attend work because of sickness you must notify your line manager, Head of Department, or the person nominated for absence reporting, in accordance with the reporting rules for your department.
24. You are entitled to six months full pay and six months half pay during periods of absence due to sickness. The full sick pay scheme, which is amended from time to time, is available at:

<https://www.royalholloway.ac.uk/iquad/collegepolicies/documents/pdf/humanresources/sickpa>

[yscheme.pdf](#)

FAMILY FRIENDLY AND MATERNITY POLICIES

25. The College has an occupational maternity leave and pay policy. The current policy is available at: <http://www.rhul.ac.uk/personnel/policydocs/Matleavev2.pdf>
26. Other Family Friendly entitlements include occupational [paternity pay](#).

DISCIPLINARY PROCEDURES

27. The disciplinary procedure which applies to your appointment is available at:

<https://www.royalholloway.ac.uk/iquad/documents/pdf/humanresourcespdf/policies/disciplinary-policy-august-2016.pdf>

Alternatively, a copy is available from the Human Resources Department on request.

28. There is a right of appeal against any decision reached under the disciplinary procedure. All appeals must be made in accordance with the terms of the procedure, in writing and to the Director of Human Resources.

GRIEVANCE PROCEDURE

29. If you have a grievance relating to your employment, you should discuss the matter personally with your immediate supervisor in the first instance. Where this is not appropriate the matter should be discussed with your supervisor's line manager. The College has a formal Grievance Procedure which is available at:
<https://www.royalholloway.ac.uk/iquad/documents/pdf/humanresourcespdf/policies/grievance-procedure-august-2016.pdf>

EXPLOITATION OF INVENTIONS AND PATENTS

30. If, in the course of his or her duties, a member of staff makes an invention which he or she believes to be commercially exploitable, this should be reported to the College in accordance with the Code of Practice on the Exploitation of Inventions and Patents which is available at:

<https://www.royalholloway.ac.uk/iquad/collegepolicies/documents/pdf/research/exploitationofinventionsandpatents2014.pdf>

TRADE UNION RECOGNITION

31. The College recognises three trades unions, the GMB, the UCU and Unite for negotiation and consultation concerning the terms and conditions of employment for its staff.

HEALTH AND SAFETY

32. A copy of the College's [Health and Safety Policy](#) is available on the [Staff Intranet](#). You are required to read this policy on appointment at the College. All members of staff are required to comply with the terms of the policy.

EQUAL OPPORTUNITIES

33. The University of London was established "to provide education on the basis of merit above and without regard to race, creed or political belief" and was the first university in the United Kingdom to admit women to its degrees. This tradition continues into the field of employment and the College affirms its commitment to equality of opportunity. Therefore, the equal opportunities policy of the College is that the only consideration in recruitment, training, appraisal and promotion of employees must be how the genuine requirements of the post are met or likely to be met by the individual under consideration. These requirements being met, no regard should be taken (except where legally required) of any of the following factors: race, sex, age, marital status, details of dependents, nationality, physical or mental capabilities, sexual orientation, religion or political beliefs. All members of staff are required to comply with this policy.

PERSONAL HARASSMENT

34. Royal Holloway is committed to upholding the dignity of the individual. Personal harassment can seriously worsen working, learning and social conditions for staff and students at the College. Any incident of harassment will be regarded extremely seriously and can be grounds for disciplinary action which may include dismissal or termination of registration for students.

The College's policy on bullying and harassment is available at:

<https://www.royalholloway.ac.uk/iquad/documents/pdf/humanresourcespdf/dignityatworkanti-bullyingandharassmentpolicyapril2016.pdf>

ANTI-FRAUD

35. A copy of the [College's Anti-Fraud Policy](#) is available on the [Staff Intranet](#). You are required to read this policy on appointment at the College. All members of staff are required to comply with the terms of the policy.

OTHER POLICIES AND PROCEDURES

36. The College policies and procedures relating to employment are available on the College website at

<https://www.royalholloway.ac.uk/humanresources/policiesproceduresandforms.aspx>

REVISIONS

37. If the Council approves any changes to these terms and conditions of employment, whether as a result of statutory changes or arising from a Collective Agreement, you will be notified in writing.

Appendix 1



Health and Safety Policy

(Version 5)

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Our Commitment to Health and Safety

Vision

38. Royal Holloway, University of London and its Council fully commits to ensuring the health, safety and welfare of all staff and students, contractors working on its premises, as well as others, including visitors, who may be affected by College activities. Health and safety is considered of paramount importance and our Health and Safety Policy enables the College to operate effectively and allow activities to be undertaken without detriment to people's health, safety and well-being.
39. We recognise and value the contribution made by our employees and by working together. We strive to ensure the work we do sustains a safe and healthy environment for everyone. We take the view that accidents at work are avoidable, and all work-related ill health, preventable.
40. Our goal is to continually improve our health and safety management and performance leading to standards beyond legal minimum requirements. In setting this objective, the College recognises that a positive health and safety culture can be achieved through:
- Strong leadership and management that focuses on safe working practices and behaviours. We recognise that such an approach is essential to encouraging and fostering a culture where people actively engage with and commit to improving our standards of health, safety and welfare;
 - Developing appropriate organisational structures to provide direction and support for senior managers in achieving a positive culture. We recognise that this also secures the full participation of all members of the College and supports the management of risk.
 - Ensuring that health and safety is integrated into every aspect of College business, including all educational, research, commercial, residential accommodation, recreational and management activities.
 - Providing those with accountability or responsibility for health and safety with the necessary training, information, guidance and support to enable them to perform their roles effectively. We recognise that health and safety is a line management responsibility and improvements in performance can be achieved through positive action by our competent managers and staff;
 - Sensible risk management that meets defined health and safety standards, including compliance with regulatory requirements. We recognise that taking due account of health and safety risks and ensuring such risks are managed through processes of risk assessment and risk control is integral to our operation and the prevention of injury, ill health and loss;
 - Full engagement with safety and safe working practices by staff at all levels, and by students, contractor and visitors. We recognise that health and safety is everyone's responsibility and, as such, we all have a contribution to make in improving our standards and performance.
 - People feeling they can question and challenge assumptions, which so often incubate mistakes and are encouraged to be proactive in raising concerns or reporting problems. We recognise that empowering people engenders commitment and drives improvements in our performance;
 - Continually improving our level of performance, and adapting to changing circumstances and demands while maintaining focus on health, safety and well-being. We recognise the importance of reviewing our current performance and will aim to measure the effectiveness of all our systems and processes regularly to ensure that we continually improve.

Together we can work to continually improve our health and safety performance.

The organisation and arrangements that support this Vision and the supporting Policy Statement can be found on the Health and Safety Office webpages.

Organisation and arrangements

This document contains information on the College's organisation and arrangements for the implementation of its health and safety policy.

Roles and Responsibilities

- 1) Responsibility for health and safety cascades down the line management chain of the College from the Principal to each individual. Responsibilities are allocated based on the principle that you are responsible for the work under your control, for those working under your control, and for people who are affected by your work.
- 2) A chart which shows the College's organisation for health and safety is provided in [Appendix 1](#).

Council

- 3) Ultimate responsibility for health and safety within the College rests with the College's governing body, the College Council. Council set and monitor progress against the College's Health and Safety Strategy.
- 4) Council have appointed an independent member to Chair the Health and Safety Assurance Committee. This Committee has accountability for seeking assurance on health and safety performance on behalf of Council. The Committee receives reports on health and safety performance at each meeting and an annual report from the College's Health and Safety Management Committee.
- 5) The Council have delegated to the Principal the executive accountability for health and safety.

Principal

- 6) The Principal is accountable to Council for health and safety performance and has executive authority for setting policy for the management of health and safety.
- 7) The Principal has delegated authority for the day-to-day management of the College's health and safety function to the Deputy Principal (Operations).
- 8) The Principal chairs the Planning and Resources Committee (Executive Board) and is a member of Council.
- 9) The Principal shall authorise this Health and Safety Policy and arrangements made under it.

Deputy Principal (Operations)

- 10) The Deputy Principal (Operations) is advised by the Director of Health and Safety and the College's Health and Safety Management Committee.
- 11) The Deputy Principal (Operations) has authority to approve health and safety standards and changes to the College's health and safety management system.
- 12) The Deputy Principal (Operations) meets with the Director of Health and Safety on a regular basis, is a member of the Planning and Resources Committee, and also a member of Council.
- 13) The Deputy Principal (Operations) is also responsible to the Principal for the line management of the Directors of Professional Service, the only exception being the Chief Financial Officer, who is directly accountable to the Principal.

- 14) The Deputy Principal (Operations) is assisted in his responsibilities for health and safety by the Director of Legal and Governance Services who has responsibility for the directorate in which health and safety sits.

Deans of Faculty

- 15) The Deans of Faculty are responsible to the Principal for the line management of the Heads of School/Department, including:
- Actively seeking assurance on the health and safety performance of their Departments/Schools to ensure necessary health and safety standards are being progressed and maintained.
 - Overseeing the allocation of health and safety responsibilities at departmental level.
 - Ensuring that consistency of approach is achieved throughout their area of responsibility.
 - Working with Heads of Department/School where limited resources may present difficulties in meeting the health and safety standards set, in order to resolve such issues.
- 16) The Deputy Principal (Operations) will undertake the above duties of the Deans in respect of his/her Directors of Professional Service.

Heads of Department/School and Directors of Professional Service

- 17) Heads of Department/School and Directors of Professional Service are accountable to either a Dean of Faculty or the Deputy Principal (Operations)¹ (as is administratively appropriate) for the health and safety of all staff within their area of responsibility, and for others who may be affected by the work/activities of their Department, School or Service.
- 18) They must be aware of the health and safety issues within their area of responsibility and the necessary risk control measures, and ensure that these measures are implemented.
- 19) Heads of Department/School and Directors of Professional Service must also ensure:
- They are aware of their responsibilities/accountability under this Policy and other Policies and Procedures, including their Department, School or Services performance in relation to these policies and procedures.
 - The roles and responsibilities for health and safety within their Department, School or Service are clearly defined.
 - Risks associated with departmental activities are appropriately assessed and controls implemented.
 - The recommendations of health and safety audits are completed within required timescales, or where this is not achievable, appropriate interim measures (which may include cessation of the activity) are implemented to ensure safety and health is not compromised.
 - The health and safety competency and training needs of staff are identified, according to their role or work activities, and staff complete such training.
 - That any changes to the working arrangements in their area of responsibility that have implications for health and safety are brought to their attention, assessed and appropriate remedial action taken.
 - Staff are consulted on matters that may affect their health and safety. This requirement will either be satisfied by having a regular agenda item at Department, School or Service management meetings, or, where the health and safety risk profile makes it appropriate, to establish a specific health and safety committee. The meeting or committee should have the aim of:
 - 1) Furthering consultation on health and safety issues;
 - 2) Providing a forum for workplace health and safety issues to be discussed and resolved;
 - 3) Monitoring health and safety performance of the Department, School or Service.
 - A document is produced to communicate the health, safety and welfare arrangements of the Department, School or Service. The document must contain, as a minimum:
 - i. A statement setting out that the Head/Director is accountable for health and safety
 - ii. A description of the organisational arrangements for health and safety, and
 - iii. The information required by staff (and others) to be able to work safely and to safeguard their

health, including any action required in the event of an emergency.

- Health and safety audits and/or inspections of the premises occupied and activities take place at a frequency commensurate with the risks within the Department, School or Service, and at least once per year. Remedial action taken in response to these inspections should be reported through the above described meeting or committee. This will ensure that existing systems are kept under review and remain effective.
- ii An annual report is made to their line manager on health and safety performance achieved and their plans to address any identified concerns, including possible bids to be considered as part of the planning round.
- 20) In certain circumstances, the establishment of performance standards and management arrangements for their execution may be better achieved at a Faculty level. In such cases, arrangements will be agreed with the relevant Dean to ensure that responsibilities and accountabilities are clearly defined and effective co-ordination and monitoring processes are in place to ensure consistency of approach and practice across all Departments.
- 21) Where it may lie outside of a manager's level of responsibility to take appropriate action (which may include funding), the matter must be referred to the next level of management.

Health and Safety Co-ordinators

- 22) Heads of Department/School and Directors of Professional Services are responsible for appointing at least one Health and Safety Co-ordinator to assist them in meeting their health and safety responsibilities.
- 23) Departmental Health and Safety Co-ordinators will be accountable to their Head/Director for the day-to-day creation and maintenance of the health and safety management system for the Department, School or Service.
- 24) The appointment of more than one Health and Safety Co-ordinator may be necessary and will be dependent on such factors as the size of the Department/Service and the potential risk presented by its activities.

Supervisors

- 25) Supervisors (i.e. staff in a supervisory position), including Principal Investigators and faculty members responsible for students are accountable for the health and safety of the people, activities and projects that they supervise. They must be aware of the health and safety issues and control measures relevant to their activities and projects and ensure that a risk assessment is in place before commencement of any hazardous activity. They must also comply with the College's Health and Safety Policy, other policies and procedures, and any other relevant arrangements within their area or activity.

Individual Members of Staff and Students

- 26) Individual Members of Staff and Students will co-operate and comply at all times with the health and safety information, instruction and training provided and bring without delay to the attention of their line manager or person responsible for the area or activity, any identified hazards or necessary improvements. They do, therefore, have a duty to take reasonable care for the health and safety of themselves, and of others whom their actions or omissions may affect.
- 27) Each member of staff is accountable to their line manager for the health and safety of all the staff they line manage, of others who may be affected by their work, and for the premises and equipment that they manage. Staff cannot delegate this accountability, but must take positive steps to demonstrate that any delegation of tasks to others is accompanied by a monitoring system which ensures such tasks are carried out.

- 28) While involved in College activities on or off campus, students must comply with the College's [General Regulations](#).
- 29) All persons must co-operate with the College to enable it, or any other person, to comply with any duty or requirement imposed by health and safety legislation. Specifically, no person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions.
- 30) Failure to comply with the above requirements may be regarded as a breach of English Law and/or College Regulations and may result in disciplinary action.

Contractors

- 31) The term Contractors will include agency staff and consultants.
- 32) The College requires that contractors ensure their activities will not endanger College staff, students or others.
- 33) All contractors will be required to:
 - Comply with this Health and Safety Policy, and any College Policies and Procedures applicable to their operations.
 - Comply with the health and safety conditions specified in the contract and with all statutory requirements.
 - Employ persons competent to carry out their duties without risk to health and safety of themselves and others.
 - Treat the College's arrangements and procedures as minimum standards to adhere to and follow appropriate industry guidance and best practice at all times. Failure to comply could prejudice the awarding of future contracts by the College.
- 34) College staff that appoint contractors are responsible for managing their relevant contractors who provide services and/or work in premises occupied by or on behalf of the College.

Visitors

- 35) All visitors to the College are required to follow any [health and safety instructions](#) given to them.

Director of Health and Safety

- 36) The Director of Health and Safety is accountable to the Principal for ensuring that the College has appropriate professional advice on health and safety issues. The post holder has authority from the Principal to stop activities that put people at imminent risk of harm. The Director of Health and Safety reports to the Deputy Principal (Operations) through the Director of Legal and Governance Services.
- 37) The post holder will also be responsible for:
 - Developing the Health and Safety Policy and other performance standards.
 - Advising on the application of relevant health and safety legislation.
 - Providing a range of training to enable members of the College to meet their responsibilities for health and safety.
 - Managing the ongoing programme of health and safety audits.
 - Administering the incident reporting system and reviewing the incident data to identify trends and any lessons learned.
 - Investigating significant incidents and for reporting on behalf of the College under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.
 - Liaising with the Health and Safety Executive (HSE), the Environment Agency and other regulatory authorities on matters of health and safety.
 - Maintaining a resource of information and guidance on the College's Health and Safety website.

- Monitoring compliance with the requirements of the Policy.

Safety Representatives

- 38) Safety Representatives (trades union or non-trades union) should, within the Department or area they represent:
- Assist with the promotion of safe working practices.
 - Familiarise themselves with this Health and Safety Policy, individual policies and procedures and associated performance standards.
 - Liaise with their Head of Department/Service, and the Director of Health and Safety, in incident investigations and health and safety audits.
 - Where a member of the Health and Safety Consultative Group, take part in proceedings, representing their staff and presenting to them information from meetings.
 - Report personally, or endeavour to ensure that other staff report, any hazardous or potentially hazardous situations.
 - Familiarise themselves with the action required in cases of emergency such as those related to fire, accidents and security issues.

Health and Safety Committees

- 39) This Committee structure forms part of the College's health and safety management arrangements.
- 40) A chart which provides an overview of this Committee structure is provided in [Appendix 2](#).

Health and Safety Assurance Committee

- 41) This Committee is chaired by an independent member of Council, appointed by the Governing Body.
- 42) The purpose of the Committee, is on behalf of the Council, to satisfy itself that the College is managing all activities in accordance with its responsibilities in respect of the health and safety of staff, students and any other persons who could be affected by such activities. The Chair of the Committee (and other members representing Council) will seek assurance from members of the senior management team through an ongoing review of the College's management arrangements and health and safety performance.
- 43) The Committee reports to Council and the terms of reference can be found [here](#).

Health and Safety Management Committee

- 44) This Committee is chaired by the Director of Governance and Legal Services and is a sub-committee of the Planning and Resources Committee.
- 45) This Committee has been established under the delegated authority of the Principal, with the purpose of developing and managing the College's health and safety policy and strategy. The Committee also monitors the health and safety performance of the College, reviews incidents and provides a forum for obtaining input from management and representatives of the Health and Safety Office on the development and direction of health and safety at the College.
- 46) The Committee reports to the Planning and Resources Committee and the Health and Safety Assurance Committee. The terms of reference can be found [here](#).

Health and Safety Consultative Group

- 47) The College consults with and involves staff and student representatives on health and safety issues. It achieves this formally through the Health and Safety Consultative Group.

- 48) The purpose of the Consultative Group is:
- To meet the statutory requirement for the College to consult with its employees on health and safety-related issues, specifically, the following Regulations: the *Safety Representatives and Safety Committees Regulations 1977 (as amended)* the *Health and Safety (Consultation with Employees) Regulations 1996 (as amended)*
 - To be the formal means for representatives of management, staff and students to meet regularly for the purpose of establishing and developing a positive and progressive health and safety culture.
- 49) The Group reports to the Health and Safety Management Committee and is chaired by the Director of Health and Safety. The terms of reference can be found [here](#).
- 50) The College recognises health and safety representatives appointed by UCU, UNITE and GMB. Representatives of the Students' Union are also invited to represent the student body. Furthermore, the College will consult with staff and students as appropriate on relevant issues related to health and safety performance.
- 51) All Departments, Schools and Services must have their own health and safety arrangements, which provide opportunities for staff and managers to consult on, discuss and agree measures to improve health and safety within their respective areas.

Individual Policies and Procedures

- 52) The detailed arrangements for dealing with specific health, safety and welfare issues are identified in this Policy, individual policies and procedures and associated formal documents. These are available on the [College Health and Safety Office website](#).
- 53) These standards establish the College's management arrangements for health and safety and the manner in which risks are to be assessed and managed. Specifically, they identify the health and safety standards to be attained, who is to do what and when, and the specific results to be achieved. They set performance standards and connect individual responsibilities to required outputs, with the achievement of objectives based on specific tasks, the results of which are measurable.
- 54) Details of these policies and procedures is provided in [Appendix 3](#).

Monitoring health and safety

- 55) In order to confirm the continued validity and effectiveness of the existing health and safety management system, including the implementation of this Policy and the requirements of individual policies and procedures, the College will adopt suitable proactive and reactive monitoring arrangements, which where appropriate will be sector benchmark related. Such indicators will facilitate a critical review of trends and necessary corrective action.
- 56) The College's arrangements for monitoring health and safety will be detailed in formal procedures (to be produced as an Appendix to this Policy).

Review

- 57) The College is committed to reviewing and developing its policy, and these organisation and arrangements for implementation, to ensure that they remain both current and relevant. To achieve this, the Director of Health and Safety will ensure that this Policy is reviewed annually, with additional reviews being initiated following a significant organisational change or where there is reason to suspect it is no longer effective.
- 58) No alterations to the Policy or organisation and arrangements will be made without formal consultation through both the Health and Safety Consultative Group and the Health and Safety Management Committee.

59) Final agreement to any changes will be sought from Council, through the Health and Safety Assurance Committee, with final approval at the Planning and Resources Committee.

Matt Purcell

**Approved by: Planning and
Resources Committee Date:
22nd January 2018
To be reviewed: before January 2019**

Note: In November 2018, all references to Chief Operating Officer (COO) were changed to Deputy Principal (Operations). The post of COO no longer exists, and his/her responsibilities are transferred to the Deputy Principal (Operations). No others changes were made to this Policy.

ROYAL HOLLOWAY UNIVERSITY OF LONDON

ANTI FRAUD AND RESPONSE PLAN

PART 1

1 Introduction

1.1 The policy is designed to ensure that the College:

- is safeguarded against occurrence, through promoting an anti-fraud culture and the operation of sound systems of internal control
- has systems to facilitate detection
- has a plan for responding to any occurrence.

1.2 Policy Statement

1.2.1 Royal Holloway, University of London is committed to preventing acts of fraud and corruption, whether initiated within the College, or by external sources. The College is committed to promoting an anti-fraud culture and reducing the opportunities for fraud and corruption to the lowest possible level of risk.

1.2.2 It is required that everyone connected with the College, in whatever capacity, will act with integrity and without intent to commit fraud or corruption. It is further expected that all staff will comply with legal requirements and with all regulations, procedures and practices of the College including the obligation to report all reasonable suspicions of fraud. Fraud committed by students will be addressed using the Student Disciplinary Regulations, Academic Regulations and other policies relating to students as appropriate.

1.2.3 Fraud and corruption will not be tolerated. The College will investigate all instances of attempted and suspected fraud committed by staff, consultants, suppliers and other third parties and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to appropriate disciplinary or legal action.

1.2.4 All staff are notified of their responsibilities in relation to protecting the College from Fraud and Corruption at the start of their employment. This policy is available on the College web site and is brought to the attention of all staff from time to time.

2 What is Fraud?

2.1 Fraud encompasses irregularities and illegal acts which are characterised by an intention to deceive or mislead, and where the individual knows the information is false or at least has good reason to suppose that it is not true. Fraud is likely to result in an unauthorised benefit to an individual but could also be to the benefit of the College. Fraud in Higher Education does not always relate to financial matters and could also be to achieve other benefits such as an improved research reputation, results or funding.

Examples include:

- acceptance of bribes or bribing others
 - claims submitted for goods not received
 - intentional failure to act in circumstances where action is required by the College or law
 - intentional misrepresentation of events or data
 - theft
 - unauthorised or illegal use of confidential information
 - intentional and improper representation of the College's assets to a third party
- 2.2 Individuals can be prosecuted under the Fraud Act 2006 and the Bribery Act 2010 if they make a false representation, fail to disclose information or abuse their position.

3 Protecting the College

3.1 Checking References and Qualifications

New members of staff should be screened before appointment. In most cases it is sufficient to obtain and check a previous reference and check any qualifications where appropriate. Staff with financial responsibilities must have references to cover a reasonable continuous period. Appropriate checks should also be made on staff working with children or vulnerable adults.

3.2 Internal Control

3.2.1 This is an essential measure in avoiding occurrences of fraud. In addition to College policies on matters like the processing of expense claims, tendering for contracts and accepting hospitality, all processes which could be open to fraud or corruption should involve effective management controls such as the segregation of duties, checking of exception reports and the random checking of transactions.

3.2.2 Managers have specific responsibilities for preventing and reporting fraud. In particular:

- Monitoring compliance with internal controls and agreed policies and procedures e.g. Financial Regulations, checking staff lists and budget reports, proper control over cash transactions and holdings.
- identifying unusual behaviour in staff members such as regular late working without obvious reason or suspected alcohol or gambling problems. Advice should be sought from HR on how to address these matters
- Notifying appropriate staff of any indications of fraudulent activity.
- Assisting in the investigation of suspected fraud.

3.2.3 All staff are responsible for:

- Ensuring that the College's reputation and assets are protected against fraud.
- Reporting known or suspected fraud.
- Assisting in the investigation of fraud

3.2.4 The College's Financial Regulations provide clear guidance on issues of financial

responsibility. All Heads of Departments and other Senior Staff are responsible for ensuring they have familiarised themselves with the Regulations. These are available on the Finance Department's web pages.

3.2.5 The College has clear guidance on purchasing and procurement. Heads of Departments are responsible for ensuring that staff involved in purchasing and procurement are familiar with the guidance which is available on the Finance Department's webpages.

3.2.6 All staff making claims for expenses are required to make any claims within the terms of the College's Travel and Subsistence policy which is available on the Finance Department's web pages. This policy also provides guidelines on the acceptance of hospitality and gifts.

3.3 Internal and External Audit

Planned audit work is used to review and provide assurance on performance, processes and controls across the full range of College activities. All staff are required to comply with requests for information or assistance made by the Internal or External Auditors.

4 Reporting

Members of Staff are essential in identifying occurrences of fraud and corruption and should raise any concerns with the Director of Finance and their Head of Department in line with the College's Financial Regulations and Public Interest Disclosure Protocol (available on the College web pages or from the College Secretary's Office). The latter document reinforces the College's Financial Regulations and provides protection for staff reporting incidents of suspected fraud or corruption from victimisation. Matters may be raised in confidence but where an investigation is undertaken it should be recognised that it may not be possible to maintain complete confidentiality. Where it is not appropriate for the matter to be reported to the Head of Department or the Director of Finance the matter can be reported directly to the College's Internal Auditor. Matters that are less obviously of a financial nature should be reported to the College Secretary.

PART 2

Response Plan

This purpose of this plan is to allocate responsibilities for action and reporting lines in the event of a suspected fraud or irregularity.

Initiating Action

1. Actual or suspected frauds or irregularities may be identified through a number of mechanisms, including:
 - operation of internal controls
 - reported by staff in accordance with Financial Regulations or using the Public Interest Disclosure Protocol

- reported by third parties;
 - as a result of Internal or External Audit review.
2. Regardless of how they are initially reported to the College management, all actual or suspected incidents should be reported to the Internal Auditor to allow an independent investigation to be undertaken promptly.
 3. This plan covers recording and securing evidence, preventing further losses and the investigation process. Managers on identifying or being advised of a suspected fraud should report it immediately as indicated elsewhere in the policy. They should also take immediate and effective action to secure all relevant information and documentation and prevent any further losses pending the initiation of an investigation as described below.

Investigation

3. With the Directors of Finance and Human Resources, and the College Secretary (or their representatives), and the relevant line manager, the Internal Auditor should agree the following as soon as possible and develop an action plan with allocated responsibilities:
 - whether an investigation should take place – an investigation would normally be expected
 - the staff who should undertake the investigation in addition to the Internal Auditor
 - the initial scope of the investigation
 - whether any external support is required for the investigation
 - whether the police or College insurers should be contacted prior to an investigation taking place
 - the timescale for the investigation
 - whether any members of staff should be suspended from work prior to the start of the investigation or at any point during the investigation
 - any other action that should be taken immediately to secure evidence or protect the College from further loss
 - whether the matter requires notification to the Chair of the College Council and the Chair of the Audit Committee prior to an investigation
4. Delay in arranging a meeting of the above officers should not delay developing a plan or commencing an investigation. Consideration should be given to whether all of the officers need to be involved in the particular case. Consideration should also be given to the inclusion of others if appropriate.
5. The Principal should be notified of the issue by the Director of Finance or one of the other officers if appropriate.
6. Where there appears to be sufficient evidence to warrant reporting to the police the Internal Auditor will liaise with the police and be responsible for future communications with them over the matter.
7. If it becomes necessary to interview a member or members of staff under suspicion, the Internal Auditor, or an appropriate member of the investigation

team, will carry out such interviews in accordance with the Codes of Practice related to the Police and Criminal Evidence Act. Adherence to these Codes will also ensure that any other staff assisting in such interviews are aware of the requirements of the Act.

8. Investigations must also be carried out in accordance with the requirements of the College's Disciplinary Procedures.
9. On conclusion of the investigation a report will be produced for consideration by the relevant line manager and the officers named in paragraph 3, recommending further actions. The Principal will also be notified of the outcome of the investigation.

Action

10. Where evidence of fraud or corruption has been found it would be expected that a disciplinary hearing would be arranged and the police would be informed if this has not already occurred.
11. Other actions should be considered. These might include further investigations of systems or processes, or legal action, which might be particularly appropriate in incidents involving contractors or other third parties.

Recovery of Losses

12. Every effort will be made to recover any losses suffered as a result of fraud perpetrated on the College.

Reporting

13. In accordance with the HEFCE Audit Code of Practice some cases of fraud or suspected fraud must be reported to HEFCE. This should be done by the Principal as soon as possible following the investigation. The Chair of the College Council and the Chair of the Audit Committee must also be notified.
14. All fraud and corruption investigations must be reported to the Audit Committee with a brief description of the incident, the value of any loss, the means of perpetrating the fraud, the measures taken to prevent a recurrence and any further actions that are required. This report would normally be prepared by the Internal Auditor and be made available to the College's External Auditors.

Approved by the College Council 13 October 2010

Policy Owner – Chief Operating Officer and Head of Governance

Equality Impact Assessment – no impact identified