BIOSAFETY POLICY

New document for approval Please note that this document is a final document and approved.	**Synopsis** This policy specifies the roles, responsibilities, actions and processes necessary to ensure that work involving bioagents and genetically modified organisms is controlled and managed.
Approval **Approved by: Operating Board**	

Date: 17th October 2017

Revision Record

ISSUE	DATE	REASON FOR REVIEW
Draft 1	March 2017	New document for consultation
Draft 2	September 2017	Final draft for approval after taking into consideration comments from the members of the University Biosafety Committee, University Health and Safety Committee and the University Management Group.
Issue 1	October 2017	Approved by the Operating Board

DISTRIBUTION:

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Implementation

From receipt after approval

Contents

1. Standard Terms / Abbreviations

Throughout this document standard terms and abbreviations have been used. The terms and abbreviations with their definitions are set out below:

Term	Definition
Bioagent	Any micro-organism, cell culture or human endoparasite, including any that have been genetically modified, which may cause any infection, allergy, toxicity or otherwise create a hazard to human health. The definition of a micro-organism includes non-cellular microbiological entities (such as viruses)
Organism	All organisms, including multicellular organisms such as animals, plants, insects, nematodes, as well as micro-organisms
Micro-organism	Bacteria, fungi and viruses, as well as cell and tissue cultures from plants and animals or humans. Naked nucleic acid, oligonucleotides, synthetic DNA, plasmids or liposomes are not considered to be micro-organisms. Full length copies of genomes of viruses that have the potential to be infectious in their own right are considered to be micro-organisms (whether they are encapsulated or enveloped or not)
Genetic Modification	Any alteration of the genetic material of an organism which does not occur naturally and has been achieved through one of the techniques as set out in Part 1 of Schedule 2 of The Genetically Modified Organisms (Contained Use) Regulations 2014
COSHH	Control of Substances Hazardous to Health
Risk	The likelihood of hazard causing harm to person or damage to property
Risk Assessment	An assessment of the likelihood of hazards present in a work place or activity causing harm or damage and likely consequence of such harm or damage occurring
Because We Care	This is the University of Aberdeen's approach to Health, Safety and Wellbeing of staff and students. It underpins the hearts and minds way of continuously improving

2. Introduction

The University of Aberdeen undertakes research involving both bioagents (biological agents) and genetically modified organisms (GMOs). Because we care, we will ensure that work with bioagents and GMOs is managed effectively by conducting risk assessments that are comprehensive and any resulting controls are proportionate to the risks identified and are implemented.

Significant findings from the risk assessments, including the controls required, will be communicated clearly to staff and students in order that they understand the risk, the control measures identified and their responsibilities.

3. Purpose

The purpose of this Policy is to acknowledge our work with both bioagents and GMOs at the University of Aberdeen and for that work (including sharing of biological materials) to be conducted in a safe manner and in accordance with regulatory requirements.

4. Scope

This Policy applies to all University of Aberdeen staff (including visiting academics), students, visitors and contractors (see also Management and Control of Contractors Policy) employed by the University who work with bioagents and GMOs. The Policy also applies to University spin out companies where work involves bioagents and GMOs.

5. Objectives

Our overall objectives are to ensure that the use of bioagents and GMOs for teaching and research purposes is conducted in a manner which is, as far as is reasonably practicable, safe and minimises risks to individuals.

All departments/schools that use bioagents and GMOs for teaching or research purposes shall have local arrangements in place that comply with this Policy.

6. Legislative Context

The Health and Safety at Work Etc. Act, Environmental Protection Act and Control of Substances Hazardous to Health Regulations require controls for work with biological agents to protect people and the environment. The Animal Health Act and Specified Animal Pathogens Order require controls for work with animal pathogens and other relevant

materials to protect animal health and the environment. The Plant Health Act and Plant Health Order require controls for work with plant pathogens and pests and other relevant materials to protect plant health and the environment.

The main regulator for biological safety is the Health and Safety Executive's (HSE) Biological Agents Unit. The University is registered with the HSE as two distinct centres for working with bioagents / GMOs. These are GM453 and GM490 for Old Aberdeen and Foresterhill respectively.

7. Responsibilities

7.1 Heads of Schools / Sections

Heads of Schools / Sections are responsible for:

- Ensuring that the area that they are responsible for is compliant with all relevant laws and statutory regulations
- Ensuring that the relevant regulatory authorities are notified of activities with bioagents / GMOs
- Appointing a competent individual(s) in the role of Local Biological Safety Officer (LBSO) to assist the School / Section in the matters of advising and monitoring of biosafety/GMO within the School / Section
- Ensuring that formal risk assessments are conducted and control measures are identified for all work involving bioagents / GMOs
- Ensuring that adequate resources and equipment (including PPE) are made available to effectively manage risks arising from work involving bioagents / GMOs
- Ensuring suitable and sufficient information, instruction and training is provided to individuals working with bioagents / GMOs
- Ensuring that plant, equipment and facilities are fit for purpose and are maintained

7.2 Principal Investigators / Laboratory Managers

Laboratory Managers / Principal Investigators are responsible for:

- Ensuring that formal risk assessments are conducted for all work involving bioagents / GMOs and are reviewed on a regular basis
- Ensuring that their staff / students are adequately trained and competent to conduct their work safely
- Providing supervision to their staff / students proportionate to the risks involved to maintain a safe working environment
- Dealing with any reported faults in plant, equipment and facilities to have the faults rectified.
- Ensuring that faulty or out of statutory inspection date equipment is put out of service and not used until fault rectified or statutory inspection completed

7.3 Staff & Students

Staff and students working with bioagents / GMOs are responsible for:

- Complying with any instructions and biosafety procedures which relate to the work
- Immediately reporting any malfunction or failure in any controls
- Immediately reporting to their supervisor or Local Biosafety Officer any incident involving bioagents or GMOs
- Ensuring they are familiar with any emergency biosafety procedure implemented in their work area
- Ensuring that risk assessments and associated procedures reflect current practices and where necessary if changes are identified then these are raised and communicated to all concerned

7.4 Local Biosafety Officers (LBSO)

Local Biosafety Officers (LBSO) will be responsible for:

- Liaising with the University Biosafety Officer on matters pertaining to biological safety and GMOs
- Providing advice on risk assessments, appropriate controls, and waste disposal for the use of bioagents / GMOs
- Where appropriate, assisting in the preparation of contingency plans and responding to incidents involving bioagents / GMOs
- Participating in internal and external inspections and audits of areas where work is conducted with bioagents / GMOs
- Representing their School / Section on matters pertaining to work involving bioagents / GMOs

7.5 University Biosafety Officer (UBSO)

The University Biosafety Officer (UBSO) is responsible for:

- Liaising with the HSE on matters pertaining to biological safety and GMOs
- Liaising with the HSE with regards to notifications required under the Genetically Modified Organisms (Contained Use) Regulations and Control of Substances Hazardous to Health Regulations
- Providing oversight of the work conducted within the Containment Level 3 suite and review reports of maintenance activities conducted within the CL3 suite
- Being a member of the Old Aberdeen and Foresterhill Biological Safety Committees
- Act as a focal point for queries relating to use of bioagents / GMOs within the University
- Carrying out annual audit of the CL3 suite

8. Biological Safety Committees

The Old Aberdeen and Foresterhill sites will convene a Biological Safety Committee (BSC). These Committees shall meet, a minimum of three times a year. The remit of the Committees shall be to:

- Give advice on risk assessments conducted under the Genetically Modified Organisms (Contained Use) Regulations
- Authorise work involving bioagents and GMOs after consideration of:
    - The risk assessments
    - Laboratory facilities
    - Staff / student training / supervision
    - Arrangements for testing and maintaining control & inactivation measures
- Report to the University Health and Safety Committee on risks posed to people and the environment by biological hazards at the University
- Review inspection/audit reports
- Review accidents concerning bioagents / GMOs

9. Arrangements

This Policy shall be implemented at the School level through the development of local policies and procedures appropriate to the work being conducted. It is expected that the majority of queries relating to bioagents / GMOs will be resolved at a local level relying on local expertise and management involvement.

Local policies and procedures shall be reviewed on an annual basis to ensure that they reflect good laboratory practice, new techniques and ensure that controls are suitable for the work being conducted.

Local emergency and contingency plans should be in place to cover any foreseeable incidents. Any incident involving exposure or potential exposure to staff, students or public shall be notified to the University Biosafety Officer and who then shall be informed of any follow up actions and the Regulator's involvement.

10. Competence

Schools shall ensure that staff and students are competent in the techniques required to operate safely for their relevant areas of work through documented training procedures. Staff and students shall be made aware of the significant findings of the risk assessments for the work that they are conducting in order that they understand the biological risks and corresponding controls associated with the work they are undertaking.

11. Monitoring arrangements

Schools shall put in place measures to monitor the implementation of controls which have been identified as part of the risk assessment process. Inspections of working practices and procedures as well as working environments shall be conducted on a regular basis. Using an appropriate checklist shall ensure a consistent approach during the inspections. A record of these shall be kept by the School.

Health surveillance of individuals may be required dependent on the findings of the risk assessments. Schools shall make such arrangements through the University's Occupational Health Service

The Central Safety Team shall undertake audits of key areas of work with bioagents / GMOs on a frequency determined by the risks resulting from the bioagents / GMOs. The Containment Level 3 suite shall be inspected and audited on an annual basis by the Central Safety Team.

12. Maintenance of plant, equipment and facilities

Schools shall put together a schedule of maintenance of plant, equipment and facilities to keep it in an efficient working order and in good repair to safeguard the health of staff and students. There shall also be a system in place to ensure that all protective equipment (including Personal Protective Equipment) is maintained in line with regulatory requirements and manufacturer's recommendations.

Schools shall have a system in place to report faults with protective measures, plant, equipment and facilities required to protect staff, students & the environment. Procedures shall enable removal from use, repair and/or replacement of the faulty protective measures. Procedures shall be in place to ensure that individuals who are impacted by these faults are informed and alternative measures are taken to protect them.

13. Management Review

This Policy shall be reviewed at least annually by the Director of Health, Safety and Wellbeing or when any of the following occur:

a) After significant internal reorganisation or restructuring.

b) After any injury or incident or significant performance disruption that highlights the need for review.

c) Any change in relevant legislation that has an impact on working with bioagents / GMOs.

The purpose of the periodic review is also to:

a) Assess whether the objectives set out in section 5 are achieved consistently.

b) Ensure that recommendations emanating from previous reviews have been implemented and the required outcomes are being achieved.