

## Guidance on Completing Risk Assessment for New and Expectant (Pregnant) Mothers

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## 1. Overview

As an employer, the University is legally required to assess risk to all their employees and to do what is “reasonably practicable” to control all identified high risks, under the Management of Health and Safety at Work Regulations 1999 and other relevant legislation. This risk assessment must include all likely hazards which may be encountered by employees and students who are pregnant, have given birth within the last six months, or are breastfeeding.

Most pregnant workers will experience few or no complications during pregnancy. Unfortunately, however, there are some who may experience a variety of potential health problems during their pregnancy; some may continue to have problems following the birth also. There may also be factors present in the individual’s role which, whilst not a risk normally, may pose problems during their pregnancy.

Some of the typical issues that expectant mothers experience during pregnancy include; morning sickness, backache, increased need to use the toilet, fatigue, increasing abdominal size and changes to posture, balance problems etc. Whilst this list is not exhaustive, it is the responsibility of the employer to assess whether any aspect of the mother’s pregnancy, or the working conditions, could potentially cause harm to them or their child. This guidance aims to assist with this process.

This guidance applies to all University employees and students, including those who are transgender men, non-binary, or have variations in sex characteristics, who:

- Are pregnant
- Have given birth within the last six months
- Are breastfeeding

## 2. Definitions

**“Control measure”** – Something that does / will minimise the likelihood and severity of any injuries or ill health that may occur for all pregnant workers and new mothers who may be affected by the hazards identified.

**“Hazard”** – Anything with the potential to cause harm. Examples include exposure to chemicals that have the potential for spillages, perhaps causing burns to the skin or damage to the lungs; lifting heavy objects; working on a roof has the potential for falls from height or dropped tools, possibly causing death or severe fractures or working in high-stress environments.

**“Reasonably Practicable”** - Unless there is a more specific higher legal requirement, usually indicated by ‘*shall*’ or ‘*as far as practicable*’, then most precautions to minimise risk are ‘*so far as is reasonably practicable*.’ The term ‘reasonably practicable’ means that the degree of risk in a particular activity should be balanced against the resources (time, effort, cost) and difficulty of taking all the technically possible measures to avoid or minimise the risk. If applying these resources is so disproportionate to the risk that it would be unreasonable to implement them, the employer is not obliged to do so.

**“Risk Assessment”** – The process of identifying all health and safety hazards of a given work activity that may affect pregnant workers, new mothers, or their children, evaluating the associated risks, and determining the necessary control measures.

If the risks are deemed to be unacceptably high, the assessment also identifies additional steps, responsibilities, and timelines to reduce the risks further.

**“Persons at Risk”** - It is essential to identify all individuals who may be affected by the activity, including pregnant and expectant workers, new mothers, breastfeeding employees, and their children.

**“Night Work”** – Any work carried out between 11:00 PM and 6:00 AM, as defined under the Working Time Regulations 1998. Pregnant workers and new mothers must not undertake night work if it poses a risk to their health, as supported by medical evidence.

**“Suitable and Sufficient”** – A risk assessment is considered suitable and sufficient if it:

- Identifies all hazards relevant to pregnant workers and new mothers.
- Evaluates foreseeable risks and their potential impact.
- Proposes control measures that are proportionate to the risks involved.
- Complies with relevant legislation and best practices.
- Is regularly reviewed and updated as necessary

### 3. Roles and Responsibilities

#### 3.1. Risk Assessors - General

All Faculties and Directorates must adhere to the University’s risk assessment procedure and include any significant hazards that could potentially harm individuals of childbearing age within their general workplace risk assessment(s). When risks cannot be eliminated, it is essential that individuals of childbearing age who may be affected by the work are provided with information on the risks and necessary precautions.

See also [HS044 Risk Management & Assessments Guidance](#).

#### 3.2. Managers / Supervisors

Those in a managerial / supervisory role, including, but not limited to, line managers, project leads, principal investigators and tutors are responsible for conducting an individual-specific risk assessment, upon receiving written notification from their employee or student that they are pregnant. The assessment must consider any advice provided by a medical professionals e.g Doctor or midwife, relating to the individual’s health. If risks are identified, appropriate adjustments to their working conditions and/or hours must be made to reduce or control the risk and ensure the safety and well-being of both the mother and the child.

#### 3.3. Employees

Employees should promptly notify the university of their pregnancy by providing formal written notification. Guidance on how to notify the university is outlined in the [Maternity Leave and Pay Policy](#). This also includes information about time off to attend antenatal appointments, maternity leave, and benefits.

It is also the responsibility of the employee to inform their line manager and risk assessors of any medical recommendations provided by their doctor or midwife.

### 3.4. Students

Students should inform their tutor, principal investigator or project leader if they are pregnant, have given birth within the last six months, or are breastfeeding, so that an individual-specific risk assessment can be conducted. The risk assessment should consider any advice from the individual's doctor or midwife. If risks to the mother or child cannot be eliminated, alternative study arrangements should be discussed and documented in the risk assessment.

Further guidance on pregnancy and maternity for students can be found in the [Pregnancy and Maternity Policy for Students](#), or by contacting Student Services or the Students' Union Advice Team.

## 4. Guidance for Completing Risk Assessments

Faculties and Directorates should have already assessed the potential risks to individuals of childbearing age as part of their general risk assessment process (See [HS044 Risk Management & Assessments Guidance](#)). In addition, upon receipt of written notification from an employee or student, an individual risk assessment must be conducted.

### 4.1. Individual Risk Assessment

When an employee or student notifies their Faculty or Directorate of their pregnancy, recent childbirth (within the last six months), or breastfeeding, their 'Manager' or 'Supervisor' must conduct an individual risk assessment. When completing this assessment:

- The expectant or new mother should be involved in the process, so they can help to identify any conditions or circumstances with their pregnancy, that could affect their work and / or share concerns they may have about how their work could affect their pregnancy.
- Ensure the new & expectant mother understands all control measures identified
- Consider any recommendations provided by a medical professional, e.g a doctor or midwife.

These risk assessments must be reviewed regularly, with necessary adjustments made as required. It is recommended that the risk assessment be reviewed after each trimester or pregnancy and following and significant changes to the employee / students activities or the spaces they use.

**New mothers** may also be more vulnerable to workplace hazards, so risk assessments must be reviewed once they return to work. Where the mother returns to work within 6 months of giving birth then a separate new mother risk assessment should be carried out.

The following template risk assessment forms should be used:

- [HS015 Pregnant / Expectant mother risk assessment and action plan](#)
- [HS011 New mothers risk assessment and action plan](#)

## 4.2. Common risks to consider.

Aspects to consider during the assessment include:

- **Posture and position** e.g., sitting / standing for long periods, lifting or carrying of heavy loads, using a workstation that causes postural issues, etc.
- **Physical hazards** e.g., manual handling, awkward spaces, lone working, work at heights, work-related violence, vibration, etc.
- **Biological hazards** e.g., infectious agents (hazard groups 2, 3 and 4), infectious diseases. [The Approved List of biological agents: Advisory Committee on Dangerous Pathogens \(hse.gov.uk\)](https://www.hse.gov.uk/pathogens/)
- **Chemical hazards** e.g., mercury, lead, teratogens and carcinogens (check labels and supplier data), radioactive substances, pesticides, carbon monoxide, antimitotic (cytotoxic) drugs
- **Working conditions** e.g., long working hours or night shifts, infrequent rest breaks, stress, exposure to cigarette smoke, noise, very high or low temperatures, etc

If risks are identified and cannot be removed or controlled adequately, Faculties and Directorates must follow the below control measure steps, with advice from the people directorate:

- 1) Temporarily adjust the employee's working conditions and/or hours, or, if that is not possible
- 2) Offer suitable alternative work at the same pay and conditions, if available, or, if that is not possible
- 3) Place the employee on special paid leave, with full pay, for as long as necessary to protect the employee's and child's health.

## 4.3. Night Work

Pregnant workers and new mothers must not be required to work night shifts if a certificate from their doctor or midwife indicates that this could adversely affect their health. In such cases, the employee must be offered suitable alternative work or placed on special paid leave, with full pay, for as long as necessary.

## 4.4. Rest and Breastfeeding

The Workplace (Health, Safety and Welfare) Regulations 1992 require employers to provide suitable rest facilities for workers who are pregnant or breastfeeding. These facilities should be private, appropriately located (e.g., near toilets), and, where necessary, include a place to lie down and space to store breast milk. Toilets should not be used for this purpose, and this should be clearly addressed in the risk assessment.

Pregnant workers or those breastfeeding must be allowed to take breaks in suitable rest facilities. If the need for frequent rest periods significantly impacts work, the Faculty Operating Officer or Director of Professional Services, in collaboration with the People Directorate, may request an assessment by Occupational Health.

Designated rest and breastfeeding areas are available across all University campuses within first aid rooms. These rooms are equipped with a bed, sink with hot and cold running water, and are, where possible, located on the ground floor and close to toilets.

First Aid/Rest rooms are found at the following locations:

<b>Avery Hill</b>	Southwood site The Dome 041
<b>Medway</b>	Blake Building B051 Drill Hall Library DB019
<b>Greenwich</b>	Queen Anne A036 Stockwell St 11.B019 Dreadnought Basement B012
<b>Woolwich Bathway</b>	Room B013

Pregnant workers and new mothers should contact Campus Security to access the first aid rooms. Security can be contacted via the [Safezone App](#) or by calling Campus Security at:

<b>Avery Hill</b>	020 8294 0362 / 020 8331 9101
<b>Medway</b>	01634 883138 / 01634 883333
<b>Greenwich</b>	East Gate: 020 8331 7695 Dreadnought: 020 8331 9203 Stockwell Street: 020 8331 8429
<b>Woolwich Bathway</b>	020 8331 7576

## 5. Further Guidance

### 5.1. Related Legislation:

In addition to the general duties contained in the Health and Safety at Work etc Act 1974, other, more specific sets of Regulations and guidance may apply.

Links to these and further general guidance related to Pregnant Workers and New Mothers can be found on Health and Safety Executive (HSE) [Protecting Pregnant Workers and New Mothers](#) webpages.

### 5.2. Related University documents:

- [HS011 New mothers risk assessment and action plan](#)
- [HS015 Pregnant / Expectant mother risk assessment and action plan](#)
- [HS044 Risk Management & Assessments Guidance](#)
- [Maternity Leave and Pay Policy](#) (Staff)
- [Pregnancy and Maternity Policy for Students](#)

### 5.3. Other related guidance:

- [Employment Rights Act 1996](#)
- [Equality Act 2010](#)
- [Pregnant Employee Rights](#)

## 6. Document History

Details of previous reviews are as follows:

Review Date	Reviewer	Summary of Review
24-Jul-25	Vikki Wood AD H&S Services	New document: Consolidating previous code of practice and guidance and transferring onto new template. V25.1

This document will be reviewed at least annually, hereafter.