

A comprehensive approach to mental health

European Commission –

Health and Food Safety Directorate General

Unit on Disease prevention and health promotion



Introduction

On behalf of The Institution of Occupational Safety and Health (IOSH), the Chartered body for occupational safety and health professionals, with around 47,000 members in more than 130 countries. As a Chartered body, we have charitable and international NGO status. We are also listed on the EU Transparency Register (No. 913858710558-02).

As an international non-profit organisation, IOSH influences important decisions that affect the safety, health and wellbeing of people at work worldwide. We collaborate with governments, advise policymakers, commission research, set standards, engage with organisations such as the International Labour Organization (e.g. IOSH was one of the contributing organisations who was consulted on the new ILO/WHO Mental health at work policy brief¹), the World Health Organization (including the recently created Pan-European Mental Health Coalition) and we run high-profile campaigns to promote awareness of occupational safety and health (OSH) issues. IOSH contributed to ISO 45003:2021 Psychological health and safety at work: managing psychosocial risks, which gives guidance on managing psychological health and safety risks within an occupational health and safety management system.

IOSH is also member of several international research consortiums and act in an advisory capacity in key projects such as the EU-funded “MENTUPP” research² that will develop and evaluate an intervention to improve mental health in small and medium-sized enterprises (SMEs) in high-risk sectors (such as construction and health) or through commissioning research³ on return to work after common mental disorders, return to work trajectories among employees with mental health problems, reviewing the effectiveness of mental health first aid in the workplace or the ‘Irish Workplace behaviour study’ that focused on workplace ill treatment in a nationally representative sample of Irish employees.

IOSH is also an active organisation in the policy and regulatory engagement scene. We have responded to the European Commission’s roadmap and consultation on the EU OSH Framework Strategy 2021-2027 and the Pillar of social rights. IOSH also contributed to the public hearing on how the pandemic has affected the labour market organised by the European Economic and Social Committee (EESC), and the European Parliament hearing on “The Future Strategic Framework on Health and Safety at work” public hearing on draft opinion ‘Supporting mental health of health workforce and other essential workers’ and the Expert Panel on Effective Ways of Investing in Health, where we took the opportunity to respond to the potential impacts of increasingly digitalised workplaces on the workforce health, safety and wellbeing. We have also publicly endorsed the findings from the report on Mental Health in the Digital World of Work – authored by Maria Walsh MEP – that was later adopted by the European Parliament.

While many of these initiatives were designed in the context of a public health pandemic and the subsequent recovery efforts, there are pressing issues that will require revisiting the approach from policymakers to workplace mental health issues. The World Economic Forum Global Risks Report 2023 has ranked the “cost-of-living crisis” – which will bring financial uncertainty and pressures, together with long-term physical and psychological impacts on the workforce - as the most severe global risk over the next two years in the face of a global recession, aggravated by labour shortages and key workers abandoning essential activities.

¹ ILO/WHO Joint Policy Brief, Mental health at work, https://www.ilo.org/global/topics/safety-and-health-at-work/areasofwork/workplace-health-promotion-and-well-being/WCMS_856976/lang--en/index.htm

² *Mental Health Promotion and Intervention in Occupational Settings*. European Union’s Horizon 2020 research and innovation programme under grant agreement No 848137. <https://www.mentuppproject.eu/>. December, 2021.

³ See IOSH’s research reports at <https://iosh.com/health-and-safety-professionals/improve-your-knowledge/resources/?p=1&TagsResourceType=research-reports&o=2&ps=10>

IOSH's Response to the consultation

Promotion of good mental health and prevention of mental health problems – the role of regulators.

Consultative initiatives like this one help to visualise the bigger picture and interplays on how poor employee mental health and wellbeing have a critical cost to the business (in the form of absence from work, presenteeism, team cost, staff turnover and other organisational costs), as well as impacts on the employee and costs to local communities and wider society. Legislators have an important role in planning, promoting, and implementing approaches and support offerings within the workplace that can drive positive mental health outcomes. They are instrumental in changing approaches and actions on worker mental health and psychosocial health – treating risks of a psychosocial nature with the same level of concern as physical health risks and occupational safety risks. We are conscious that occupational safety and health regulatory frameworks need to better promote, prevent and mitigate occupational psychosocial hazards and risks and mental health issues.

European, national, local, and regional policy strategies need to consider the following recommendations:

- Promotion of wellbeing at work as a contributor to higher participation in the labour market, longer healthy working lives, and the sustainability of social security systems, as well as reduced expenditure on public health services and sickness benefit costs (e.g. costs associated to anxiety and depression).
- Raising awareness on the fact that investments in mental health and wellbeing at work, in particular social investments, have positive effects on efficiency and productivity at company level, and on individuals and society.
- Developing a cross-sectoral assessment of impacts on mental health and wellbeing at work to strengthen knowledge-based policy- and decision-making.
- Including a 'mental health and wellbeing at work' perspective in their reflections in the policy fields within the remit of local and regional strategies and plans.
- Through enhanced enforcement strategies by regulators:
 - recognising and promoting that 'health' within occupational health and Safety management systems covers both physical and mental health,
 - regarding the assessment of risk which includes the identification, prevention and mitigation of occupational psychosocial risks, and
 - for the protection and promotion of occupational health.

As the recent World Health Organization's World Mental Health report highlighted⁴ workplaces are pivotal to contribute to the prevention of mental health conditions. *Employers and governments have a responsibility to create more work opportunities for people with mental health conditions, and to promote and protect all people's mental health at work. For governments, that means implementing supportive legislation and regulations in human rights, labour and occupational health. For employers, WHO guidelines emphasize the importance of organizational interventions, manager mental health training and interventions for workers.* Employers have a legal and moral duty to achieve this aim, by playing a more proactive and visible role towards prioritising and committing to mental health and wellbeing in the workplace through leadership commitment and the development and delivery of policy, strategies and systematic programmes tailored to the needs of the business and the workforce. At this tipping point, for policymakers, employers and organisations to be able to navigate into this 'new world of work' a drastic change in policies and strategies for proactively managing people's physical and mental health will be required. This new mindset will require mental and physical ill health to be on an equal footing and placing a stronger emphasis on the prevention and management of mental and work-related psychosocial risks in a manner consistent with other occupational safety and health risks.

⁴ World mental health report: transforming mental health for all. Geneva: World Health Organization; 2022. Licence: CC BY-NC-SA 3.0 IGO.

IOSH advocates for a prevention first approach and support the adoption of a preventative and protective strategic approach to mental health and wellbeing at work. A collective approach to the prevention of work-related psychosocial risks and the promotion of mental health at work has still to be fostered.

Early detection and screening of mental health problems

According to the World Health Organization⁵, an important element of achieving a healthy workplace is the development of governmental legislation, strategies and policies. This can only be done through an integrated health and wellbeing framework that covers the whole cycle of intervention through prevention, early identification, support, rehabilitation and return to work practices.

IOSH advocate for a prevention first approach and support the adoption of a preventative and protective strategic approach to mental wellbeing at work. IOSH believes that occupational safety and health professionals can be fundamental to modern businesses and play a key role in the identification of health hazards, which includes, psychosocial hazards, supporting good risk management and the prevention and mitigation of occupational risks that impact health including mental health. They drive business processes and culture to create a sustainable, healthy, safe and productive workforce. They are also pivotal in creating better and more aligned workplace policies and arrangements that incorporate different aspects of mental health and wellbeing, that are holistic, worker-centred and put the job design, working conditions and the work environment at the forefront. These guidelines therefore need to reinforce the business case for employers to seek assistance and advice from specialist providers, e.g., occupational health and safety practitioners when required, with other disciplines as necessary. Investments in occupational health as a means to reducing costs associated with the prevention of mental ill health is also needed. While it is true that occupational health services (where this function exists and is available to companies) has a key role in the protection and promotion of worker health and supporting workers, however, for employees who have diagnosed conditions or are at risk of poor mental health it is important to ensure there are pathways to relevant health/clinical support and to other key organisational players as necessary (e.g., involving a mental health specialist rather than a non-specialised occupational health adviser) in collaboration with public health/primary care systems.

A more tailored approach will have to be identified, promoted and supported by policymakers when it comes to preventing and managing workplace mental health and wellbeing risks in Micro- Small and Medium Enterprises (SMEs) as they usually face a large number of economic challenges that together with other issues (e.g. lack of competency, resource, etc...) don't allow them to effectively tackle this issue. In this challenging context the case for medium or long-term investment in workplace mental health and wellbeing programs might not be clear. Considering that small businesses make up the largest part of private sector companies in the EU region, the context of Micro-SMEs remains particularly challenging when it comes to supporting staff at every stage of the mental health spectrum – and more specifically if diagnosed with a mental health condition. The fact that many of these businesses have no dedicated human resource management or occupational health and safety function or occupational health service function impacts on their ability to promote positive mental health and take preventative action.

Actions to further tackle psychosocial risks at work

It is increasingly evident that the management of work-related psychosocial risks is gaining further levels of attention in workplaces. Psychosocial risks are elements within the workplace influence sphere that can have a negative impact to the mental health and wellbeing of employees. Certain risks by themselves have the potential to bring significant harm to employees such as experiencing bullying, sexual harassment, or occupational violence. Even more prevalent, however, are the more subtle elements of work that can chip away at wellbeing over time such as poor leadership support, interpersonal conflict, job insecurity and more. Tackling these work-related risks is of upmost importance, as novel research by the ILO and the WHO⁶ has

⁵ World Health Organization. Healthy workplaces: a model for action. <https://apps.who.int/iris/rest/bitstreams/52721/retrieve>

⁶ WHO/ILO joint estimates of the work-related burden of disease and injury, 2000-2016: global monitoring report: Geneva: World Health Organization and the International Labour Organization, 2021. Licence: CC BY-NC-SA 3.0 IGO.

shown that work-related psychosocial risks and stress may lead to a deterioration in mental health, depression, cardiovascular disease, and musculoskeletal disorders. Therefore, leadership and commitment and appropriate management of these risks is necessary.

As members of the European Parliament have rightly indicated, the lack of binding common standards and principles regarding psychosocial risks in the EU is creating a de facto unequal legal protection for workers. The commission does not explain how the current occupational safety and health strategy framework is expected to keep pace with extraordinarily rapid technological and socio-economic changes with the potential adverse effects on workers' mental health and wellbeing. These include stressful interactions with robots, algorithmic decision-making in performance management, worker surveillance and monitoring, and a technology-optimised pace of work. We recommend that this initiative should be allied with an EU mental-health strategy which, recognising the changing world of work, prioritises the work-related aspect. The Coalition for Mental Health and Wellbeing in the European Parliament encourages working with Member States so that workplace mental health and wellbeing are incorporated into key labour and occupational-safety and health policies.

It is for this reason that a non-legislative EU-level initiative related to mental health at work even if supported by Member States and social partners might not be sufficient as evaluations of the European autonomous framework agreement on work-related stress and on Harassment and Violence at Work have demonstrated. IOSH recommends a thorough review of the pros and cons of a legislative initiative, in consultation with social partners, on the management of psychosocial risks and the promotion of wellbeing at work which takes a preventative approach to psychosocial risks in the workplace. We also suggest that whichever format is chosen for this non-legislative instrument it needs to include a promotion of a risk management approach to manage work-related psychosocial risks within the bedrock of an occupational health and safety management system that contributes to elevating mental-health awareness to the fore.

Other key legislative initiatives such as the one on a regulatory framework around the use of Artificial Intelligence also needs to embed provisions for workers' rights, worker protection from safety and health (includes mental health) risks and worker wellbeing.

How can we all improve support for key workers (e.g. health workforce), or protect the specific needs of vulnerable groups and socioeconomic disadvantaged groups?

With the global economy in a precarious position healthcare systems are also struggling. This is placing extreme pressures and demands on frontline workers. Special attention needs to be paid on both the short- and long-term mental health in the form of as anxiety, stress, irritation, depression, feelings of being overwhelmed and sleep difficulties. Other impact can be seen on increased workloads, longer working hours, reduced resting periods and staffing shortages in essential services, with employees reporting high levels of burnout and mental exhaustion. This makes an urgent case for the delivery of short and longer-term organisational support for key worker roles that continue working under significantly increased pressure. This needs to be made a priority from both a policy and business standpoint. For those organisations that employ staff working in front line response services there is need to ensure that occupational safety, health and wellbeing provision, management and support is effective, and ensuring monitoring and review processes are in place to ensure they remain fit-for-purpose and deliver the expected objectives and outcomes.

IOSH recommends for this section to integrate the work-related findings that are about to be published by the Technical Advisory Group from the WHO Mental health impacts of COVID-19 study⁷ *'Recommendations*

⁷ Action required to address the impacts of the COVID-19 pandemic on mental health and service delivery systems in the WHO European Region: recommendations from the European Technical Advisory Group on the Mental Health *Impacts of COVID-19*, 30 June 2021. Copenhagen: WHO Regional Office for Europe; 2021. Licence: CC BY-NC-SA 3.0 IGO.

from the Technical Advisory Group on required actions to address the mental health impacts of COVID-19 in the WHO European Region'. IOSH would like to see improvements in the protection of healthcare workers from the psychological risk factors related to providing care and services to the public during such crises. This will require investment to ensure adequate staffing levels, supervision, mentoring, training, personal protective equipment and mental health support.

We would also like to draw the attention to a growing body of research which demonstrates substantial prevalence of mental health conditions and work-related wellbeing issues amongst people who are from minority ethnic backgrounds. This is aligned with a stronger impetus on the need for an integrated approach that embeds the interplay of aspects such as race discrimination, sexual harassment, and gender equality. This creates a policy loophole in the prevention of workplace psychosocial and wellbeing risks, particularly for workers from vulnerable disadvantaged groups, including precariously employed people and employees returning to work after experiencing mental health issues or after sickness absence related to mental health.

Final remarks.

It is true that the impacts of mental illness and ill-health in the workplace have never been higher or more visible. Rising mental health conditions in the context of unprecedented labour shortages and increasing numbers of workers leaving work because of long-term illness or disability leads to increased unemployment, lost productivity and loss of skilled labour.

Conversely, factors such as the increased attention from policymakers and employers, the influx of greater levels of awareness in society and from workers, and other socio-economic issues can constitute a driving force for improved worker engagement, enhanced productivity, and organisational sustainability.

With that in mind, IOSH champions for a coordinated response to prevent and mitigate occupational psychosocial risk factors and promote wellbeing through more effective leadership and governance frameworks for mental health in the workplace that prioritises the implementation of strategies for promotion and prevention and robust evidence and research. We call on the Commission to step up support for governments, workplaces and communities to help people with mental health conditions to participate in and thrive at work.

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