CCLA Corporate Mental Health 2021 Pilot Benchmark Report





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We would like to thank the CCLA Corporate Mental Health Expert Advisory Panel for their contribution to this report and ongoing support.

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Lord Dennis Stevenson CBE

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Foreword from Lord Dennis Stevenson CBE

In 2017, the then Prime Minister, Theresa May, asked Paul Farmer and me to undertake an independent review into how employers can better support the mental health of all people currently in employment. The review, known as Thriving at Work, revealed that the UK is facing a mental health challenge at work that is much larger than we had thought. It quickly became clear that employers are losing billions of pounds because employees are less productive, less effective, or off sick.

There remain significant challenges in assessing and comparing companies on a topic as complex and poorly understood as mental health. When I was approached by CCLA to join the project's advisory panel, I had serious reservations; not so much on their ability to undertake such a task, but whether it was possible at all.

Several months in, I am now beginning to see the merit in assessing companies on their approach to workplace mental health; also, how the approach could be used to incentivise companies to act.

In this benchmark, scores are based on the extent to which employers are creating the conditions under which mental health can thrive. This includes whether they acknowledge the link between the principles of 'good work', and a mentally healthy workforce; a key element of the vision that we set out in Thriving at Work. Another one of our key recommendations was that change should be encouraged by increasing employer transparency – not only internally but also across industries and through the public domain. Since CCLA's benchmark assessments are based on information disclosed publicly by the companies themselves, I believe that done in the right way, and with the appropriate level of respect and encouragement, this approach could bring about real progress. At the very least, it will strengthen the hand of those inside companies who are trying to make headway.

In adopting a 'management systems lens', CCLA has done a remarkable job in evaluating the scope of leadership commitments, related policies, and workplace programmes at some of the UK's largest businesses. The astonishing spread of results implies that a lot of companies need to improve. Equally, there are green shoots of good practice, which should be celebrated.

It is important not to underestimate the quality of the insights that this work is producing.

Foreword from Elizabeth Sheldon

At CCLA, we have been managing investments on behalf of non-profit organisations since 1958. As you would expect, our primary aim is to make good investments for our clients. Yet, for CCLA, the good runs deeper than solely financial returns. Our starting point is that investment markets will only be as healthy as the environment and communities that support them. Therefore, we have a duty to focus on some of society's most pressing challenges to best support the generation of positive returns for our clients.

Unusually for an investment manager, we are owned by our investors. In the absence of a profit-driven shareholder, we have greater freedom to dedicate time and resources to problems that have not had the attention they deserve. We have been doing this for many years – from 2010 on climate change, from 2012 on modern slavery, and from 2019 on workplace mental health.

Why mental health? Few would disagree that companies have a moral duty to provide their workers with a psychologically, as well as a physically safe place to work. Economically, there is a wealth of data to demonstrate that in the long-term, the most successful companies are those with the best health and safety records, and the most physically and mentally healthy workers.¹ As investors, we try to be responsible stewards of our clients' assets; we also aim to invest in successful companies. Pushing for progress in workplace mental health is, therefore, a moral and an economic imperative. Through our engagement work to date, it has become clear that there is a strong willingness from companies to improve in this area. What is missing is the framework and data to know where to begin. The CCLA Corporate Mental Health Benchmark provides a good basis to guide business leaders in building a positive environment for mental health.

The value from an investor standpoint is that it allows an easier comparison as to which companies are managing the risks, and which are harnessing the opportunities to greatest effect. We believe that the benchmark's development and expansion will shine a light on this important area and help guide us and other asset owners in deploying our power as investors to provide a catalyst for positive change.

If we are successful, companies will benefit, investors will benefit, our clients will benefit, and wider society will benefit. We very much hope that the findings in this report will prove illuminating.

Chapter 1 Introduction

Setting the scene

In any given year, one in six people in the general population of the UK is currently experiencing a mental health problem, the majority of whom are of working age.² With over 31 million people in work in the UK, this is equivalent to more than five million workers who could be suffering from a mental health condition each year.³

Global health studies show that the number of cases of anxiety and depression around the world rose dramatically in 2020. Consequently, the Health and Safety Executive (HSE), the UK's national regulator for workplace health and safety, has warned that work-related stress and poor mental health is becoming a health and safety crisis for the UK's workplaces'.⁴

Notwithstanding recent events, research published prior to 2020 was already signalling the economic and human costs associated with poor mental health. For instance, studies indicated that poor mental health was costing the UK government between £24 billion and £27 billion per year (through benefit costs, lower tax revenues and cost to the NHS).⁵ In 2019, mental ill-health cost the UK economy between 3.6% and 4.9% of its total GDP.6 ⁷ ⁸ Furthermore, within the corporate sector, mental ill-health was the highest cause of long-term absence from work in 2018, accounting for at least 57% of lost working days.⁹ ¹⁰ Absenteeism, combined with presenteeism (showing up to work when ill, resulting in lost productivity) and staff turnover (with associated recruitment and temporary staff costs), resulted in a total cost to employers of £42 billion to £45 billion. This equates to an average cost per employee of £1,652 in the private sector.¹¹ Encouragingly, public awareness of the importance of good workplace mental health is growing, as is the moral, societal and business case for improving it. There are several drivers of this positive development: public media campaigns, such as Mind's Time to Change; the emergence of employer-driven networks and multistakeholder partnerships; and high-profile stories in the media about personal experiences of mental ill-health.

In parallel, there has been a heightened sense of the key role that businesses play in supporting society; in providing individuals with economic security, social connection, opportunity, and a sense of purpose.

Many organisations recognise that such a transformation requires a step-change in corporate culture. Most urgently, investment in systems and processes to ensure that psychological risks are taken as seriously as physical risks in the workplace. This is a rapidly evolving area and already several frameworks exist that are designed to support companies in adopting good mental health practices. In the context of growing awareness around the topic, it is fast becoming a business imperative to protect and promote good workforce mental health.

Background to the benchmark

CCLA's mental health engagement programme was launched in February 2019. Building upon recommendations set out by the government commissioned 'Thriving at Work' review¹², and the input of senior representatives from Public Health England, mental health charity Mind and other leading thinkers on the issue, a set of five, ambitious but workable best practice measures were created. These are to:

- establish a mental health at work plan that outlines the approach to improving and protecting the mental health of employees and regular contractors.
- promote mental health awareness amongst employees and clearly 'signpost' the support provided.
- 3. integrate mental health safeguarding into:a) job design
 - b) workplace conditions.
- 4. train line managers in mental health.
- 5. monitor and report on employee mental health and wellbeing.

These measures were put to a select group of CCLA's investee companies, with an underlying workforce of approximately 400,000 people. Whilst some of the businesses had gone above and beyond legislated minimum standards, others had made little or no progress. At the time, CCLA was advised it was the only investor asking questions about mental health.

Covid-19 gave the engagement programme a new impetus and, in April 2020, CCLA formed a coalition of investors with £2.2 trillion in assets under management and wrote on their behalf to the CEO of every FTSE 100 company. The letter urged these leaders to protect the mental health of their 4.7 million employees during the pandemic. Seventyfour of these companies responded, with wide disparity in the quality of responses received. Despite evidence of some leading and meaningful practices, there were few signs of a concerted structural focus on mental health within companies, in sharp contrast to their management approach to safeguarding physical health and safety.

2019

1

CCLA launches mental health

engagement programme

2

Mental Health Advisory

3

Five best practice measures of workplace mental health put to select group of 11 investee companies

2020

4

Coalition of investors formed (£2.2 trillion of assets) FTSE 100 engagement initiative

5 Signal intention to

develop investor-led corporate mental health benchmark



From these engagements, it became apparent that improvements in corporate practice, alongside greater transparency, disclosure and reporting of mental health was required. The concept of a corporate mental health benchmark was conceived.

Aims and objectives

The CCLA Corporate Mental Health Benchmark ('the benchmark') has been designed to assess objectively how listed companies approach and manage workplace mental health based on their published information. The benchmark will provide institutional investors with an account of a company's management and associated disclosure practices, highlight areas where there has been progress, as well as areas where more work is needed. It will also provide an effective accountability mechanism for ensuring that companies set commitments and deliver on them, through a process of continuous improvement to promote positive workplace mental health.

The benchmark is primarily aimed at the investor audience. CCLA believes that investors have a key role to play in helping to deliver systemic change in the way in which mental health is regarded and protected in the workplace. The aims of the benchmark are to:

- ensure that corporate efforts are directed towards activities that positively support the mental health of people at work.
- drive transparency on corporate disclosure on indicators of employee mental health.

- equip investors and other stakeholders with a tool for assessing the effectiveness of corporate management of business risks and opportunities associated with mental health across their global operations.
- define key expectations on workplace mental health, providing investors with an accessible way to understand and evaluate corporate practices.

About the report

This is a baseline report of the CCLA Corporate Mental Health Benchmark. It is based on findings from a pilot benchmark assessment of the largest 30 FTSE 100 companies by market capitalisation (as at March 2021) and by workforce size (those with workforces greater than 15,000 employees).

The central objective of the pilot was to test that the benchmark methodology would provide meaningful insights for investors, that could be used to increase understanding and improve dialogue with companies on this critical matter. This report sets out our findings and confirms the validity of a 'managementsystem lens' for assessing the effectiveness of companies' workplace mental health commitments, processes and systems, and performance. Whilst the pilot assessment of 30 UK companies is a relatively small data set, valuable insights are revealed. These will shape our future programme of work.

Governance

The benchmark has been developed with the support of external, expert partners.

Chronos Sustainability, a specialist sustainability advisory firm with deep and longstanding expertise in targeted benchmark initiatives, has responsibility for the creation of the assessment criteria and scoring methodology and delivery of the company assessments.

An Expert Advisory Panel, comprising independent workplace mental health experts and investors provides independent technical guidance on workplace mental health issues and supports CCLA and Chronos Sustainability in the delivery of the benchmark.

Co-chaired by Elizabeth Sheldon (COO, CCLA) and Lord Dennis Stevenson CBE (former Chair, HBOS), the Panel comprises Paul Farmer CBE (CEO, Mind and co-author, with Lord Dennis Stevenson CBE, of the 'Thriving at Work' review), Richard Caddis (Chief Medical Officer, BT) and Elena Espinoza (Senior Specialist Social Issues, UN Principles for Responsible Investment). The full remit of the Expert Advisory Panel is to:

- ensure that the CCLA Mental Health Benchmark – including its assessment criteria and scoring methodology – is accurate, robust and based on best available knowledge.
- provide independent technical guidance on workplace mental health issues.
- evaluate and assess the viability of the benchmark's overarching findings.
- understand and integrate social, cultural and ethical considerations across the programme's work.
- avoid CCLA advancing critical programme actions that may have unanticipated consequences.
- support the effective dissemination of the benchmark findings.



Chapter 2 Methodology and approach

In late 2020, CCLA appointed Chronos Sustainability to provide technical guidance on the architecture and implementation of a corporate benchmark on workplace mental health. As an initial phase, a public consultation was conducted to gather opinion on the scope and design of the benchmark, and the companies that it should cover¹³. To coincide with the consultation launch, in December 2020 CCLA hosted a webinar 'Driving corporate practice on mental health: an investment perspective'. The consultation proposed a management systems framework to ensure that the benchmark paid particular attention to the internal governance conditions necessary for changing and shaping corporate actions on mental health in the workplace.

The consultation gathered perspectives from a wide variety of global stakeholders involved in, or in some way affected by, the shaping, delivery, and impact of corporate mental health practices. Feedback was received from 74 stakeholders. The consensus was that the proposed benchmark would be important for defining the key expectations of companies on mental health and for delivering systemic change in the way in which mental health is regarded and protected in the workplace. There was broad agreement that the framework approach was robust, and the feedback provided valuable input for shaping the development of the specific evaluation criteria.

Between March and May 2021, a review of key academic and practitioner literature, international standards and management frameworks, and global initiatives related to workplace mental health was conducted. Frameworks included the 'Thriving at Work Standards'¹⁴; the ISO 45003:2021 Occupational health and safety management – Psychological health and safety at work standard¹⁵; Mind's Workplace Wellbeing Index¹⁶; CIPD: Key domains of wellbeing¹⁷; Mindful Employer: 10-steps¹⁸; and City Mental Health Alliance's Global Thriving at Work Framework¹⁹. See Appendix 1 for a list of reference sources.

An evaluation of current reporting practice was also undertaken to develop an understanding of investor and other stakeholder expectations of corporate management of the issue. In total, 30 distinct assessment criteria were developed and mapped against the key reference sources. In June 2021, these draft criteria were 'road-tested' on the published information of six UK companies. In July 2021, the findings of these initial company evaluations were presented to the Expert Advisory Panel and resulted in some minor modifications to the criteria and scoring. In July 2021, the benchmark assessment criteria were formally approved by the Panel and published on the CCLA website²⁰.



Expert Advisory Panel.

Benchmark structure

The 30 benchmark criteria are set out in four core areas:

Management commitment and policy

Management communent and policy		
General acknowledgment of workplace mental health as an important business issue, including discussion of the business risks and opportunities presented.	73 points available (28% of total)	
Signalling commitment to workplace mental health with a CEO statement.		
Overarching workplace mental health policy (or equivalent) that sets out a formal approach to workplace mental health.		
Encouraging an open culture on workplace mental health.		
Specific policy positions related to 'Good Work' including diversity, equity and inclusion (DEI), flexible working and career adjustment.		
Governance and management		
Defined responsibilities for the day-to-day management of workplace mental health as well as strategic oversight of the company's approach.	97 points available (37% of total)	
Objectives for the management of workplace mental health (with an explanation of how they are delivered and how progress is monitored).		
Policy implementation through initiatives, programmes, training, and access to support.		
Developing a culture of openness and support that is available throughout an individual's career (i.e. recruitment, on-boarding, career development, review cycles and when applicable, return-to-work).		
Employee engagement including meaningful dialogue, participation in the design and delivery of mental health initiatives, and information gathering specific to workplace mental health.		
Leadership and innovation		
Company involvement in industry initiatives or partnerships aimed at promoting positive mental health.	32 points available	
Communications which promote the company's approach to workplace mental health.	(12% of total)	
Acknowledgment of performance through notable awards and thought leadership activities.		
Performance reporting and impact		
Transparency of approach to workplace mental health seen in annual report disclosures.	es. available atives to line managers and employees (23% of total) th programmes (not clinical support). nrough reporting against objectives	
Reporting on training initiatives to line managers and employees and uptake of mental health programmes (not clinical support).		
Measuring performance through reporting against objectives and the development of key performance indicators (KPIs).		

Total of 262 points available (100%)

Assessment approach

The focus of evaluation was the corporate entity rather than subsidiaries. Our aim in the benchmark – mirroring investors' interests – is to assess how the company manages workplace mental health. That said, where corporate data were not readily available, we did give some credit to companies managing workplace mental health in specific regions or markets, where the information was clearly available and where it indicated innovative practices and processes.

Each company was assessed based on the information that was publicly available at the time of the assessment (August-September 2021). We did not provide scores for information that was not in the public domain, as encouraging companies to provide a transparent account of their approach to workplace mental health is a core objective of the benchmark.

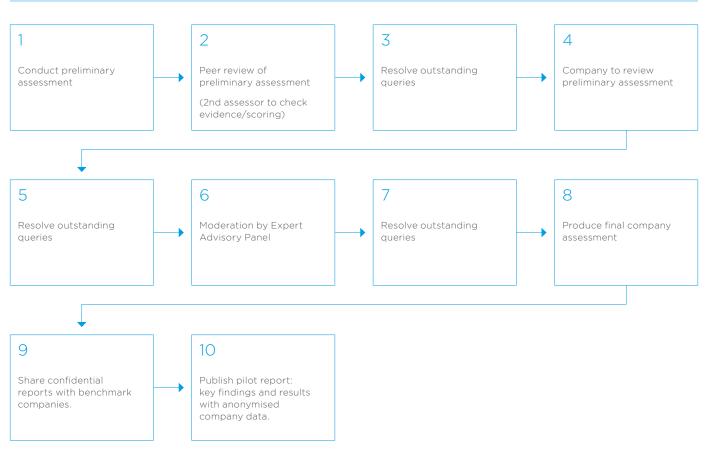
Assessment process

Pilot assessments were conducted in August and September 2021 by Chronos Sustainability, who led the technical aspects of the programme, including the development of the benchmark criteria and scoring.

The pilot covered the 30 largest UK-listed companies by market capitalisation and who had workforces of more than 15,000 employees. These 30 companies represented a combined workforce of approximately three million employees across nine industry sectors (see Appendix 2 for a list of the companies).

The first step in the assessment process was a desktop review of company information and the generation of a draft score for each company. This involved a detailed review of the material on companies' corporate websites, the material contained in annual reports, sustainability reports and other relevant publications, press releases and social media, and the material on subsidiary

Wider assessment process



company websites. Each company report was separately reviewed to check the scoring, the factual accuracy of the content and to ensure completeness and consistency.

Next, the preliminary company assessment reports were shared with the 30 companies. Each was given a four-week period to review their assessment and to respond with comments or questions. There was a high-level of engagement with 23 of the 30 companies responding to clarify their position on workplace mental health. The responses were overall positive and there was broad agreement on the scope of the assessment criteria and the scoring. 12 assessment scores were adjusted because of company feedback and where additional evidence was provided.

Insight from the pilot phase

Many companies were keen to understand their overall performance against the group, indicating that ranking can build the business case for improved performance and reporting. Several companies also reported that clear criteria for assessing workplace mental health will help to drive support for internal process improvements and investment.

In early October 2021, the Expert Advisory Panel was convened for a presentation of the preliminary results and to evaluate the viability of the benchmark's overarching findings, to confirm the suitability of the methodology and to agree a format for disseminating the results.

Specific comments and areas for further action include the following:

• The panel observed that the overall results were broadly in line with their expectations and experience with large UK-listed companies, with many of the companies studied having mature corporate mental health programmes. They suggested that future iterations of the benchmark should consider a wider range of companies, including smaller companies and companies with less well-developed mental health programmes, and geographies to assess the robustness of the benchmark across a wider universe of companies.

- The benchmark methodology is broadly effective. Certain criteria which commonly received high scores across the assessed group of companies (indicators 15, 16, 20, 25, 29) are to be removed or down weighted to ensure data outputs are meaningful for an investor audience and indicate the quality of approach to workplace mental health (rather than the existence of activity).
- The data provides rich and meaningful insights that will support an investor audience to improve dialogue with companies on this important matter.
- The wide spread of results across the UK's 30 largest companies reveals leading and lagging practices. Sharing examples of best practice will support companies to progress their approach to workplace mental health.
- To anonymise data. It was agreed that companies under assessment in the pilot phase are provided with a transition period before making public the benchmark's findings.
- To publish a summary report providing a broad picture of the level at which companies are managing the business risks and opportunities presented by mental health.

As a final stage, the panel members were invited to review the company assessments and undertake a final moderation prior to the results being finalised. This part of the process did not result in any changes to company scoring.

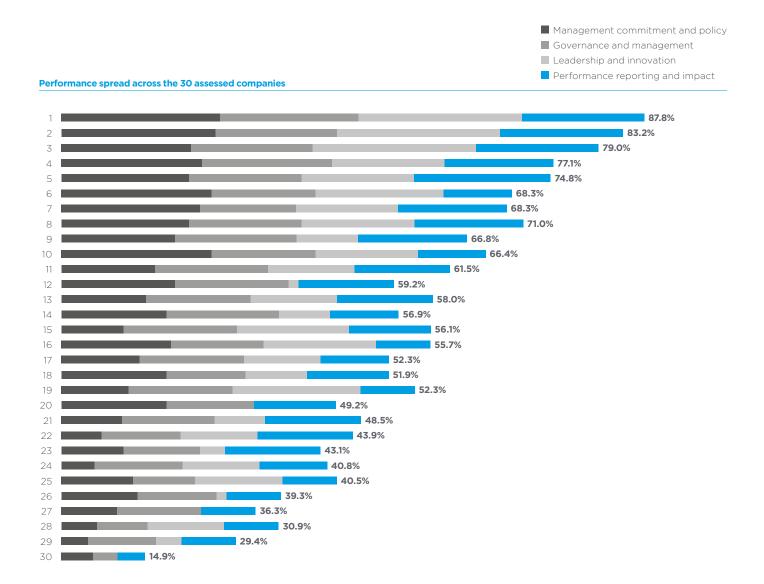
The final confidential company reports, showing individual scores and comments for each assessment criteria, as well as comparison of scoring with overall anonymised company scores, were shared with the participating companies at the time of the launch of this report.

We would like to thank the participating companies of the pilot benchmark for their engagement with the process.

^{Chapter 3} Key findings

Mental health is on the business agenda but for many companies it remains an underdeveloped issue. There were three headline findings from analysis of the pilot benchmark:

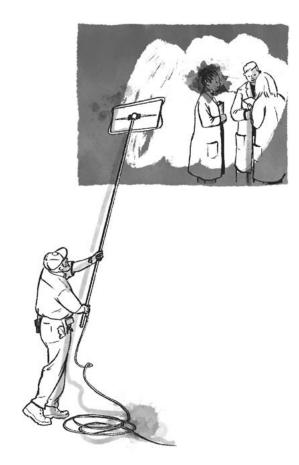
- With an average score overall of 55%, mental health is firmly on the business agenda.
- 2. There are stark differences in the way companies are managing workplace mental health, with companies' overall scores ranging from 15% up to 88% of the total points available.
- Many companies have yet to formalise their approach to workplace mental health. Only 16 of the companies assessed (53%) have formalised their commitment in an overarching policy (or equivalent document), indicating that workplace mental health is, for many employers, an underdeveloped business concern.



Other reflections

Covid-19 has led to increased management attention on mental health

Covid-19 has had a significant effect in accelerating management attention to safeguard mental health. For many companies, mental health disclosures relate to actions taken to promote and protect the health of employees during the Covid-19 pandemic; including care needs for key workers, additional assistance for those working at home, and return to office planning. What is not clear is the extent of management commitment in place to sustain this level of protection beyond the pandemic.



Companies are investing in workplace mental health

Linked to the above, there are obvious signs of investment in workplace mental health, through training initiatives, programmes and employee support services; 27 of the companies assessed (90%) have developed formal initiatives to raise awareness of mental health in the workplace.

Some companies are recognising the intersection of mental health with diversity, equity and inclusion (DEI)

Good working conditions that provide for healthy, balanced lifestyles and support people to be themselves at work can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. Good work consists of components such as flexible working, fair pay and financial wellbeing, and diversity and inclusion. The benchmark identifies six 'good work' components and looks for policy commitments in these areas which are explicit in their link to workplace mental health. Results vary across the companies assessed, but 15 of the companies assessed (50%) have established a link between DEI and providing mentally healthy workplaces.

Reporting on progress and performance is limited

Investors place value in companies determining appropriate performance metrics linked to their business case for mental health. However, just six of the companies assessed (20%) currently publish key performance indicators (KPIs) linked to their workplace mental health commitments. It is recognised that this is a developing area and that companies would benefit from some best practice examples to understand the type of metrics being used. Such examples include KPIs linked to return on investment (ROI) and self-identification data on mental health.

Examples of leading practice

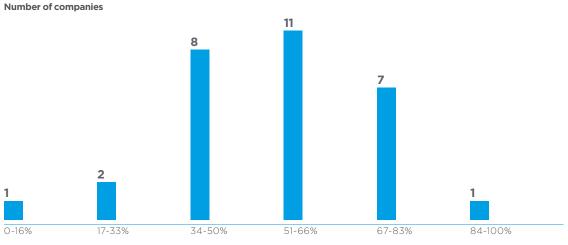
For some companies, workplace mental health has been a focus of management attention for several years and has evolved into a mature business issue. Eight companies scored above 67%, which demonstrates a level of competency in managing the business risks and opportunities associated with workplace mental health. Specifically, these companies have adopted a strategic and holistic approach to mental health. For many, partnerships and collaborative initiatives are being used to progress their mental health strategy and to share good practice. As with other sustainability issues, collaboration and knowledge sharing is key to driving long-term, systemic improvements. We are therefore keen to share examples of good practice and encourage interaction and knowledge sharing between companies.

Feedback from companies indicates a lack of demand from investors for reporting on workplace mental health

The range of company scores, from 15% to 88%, demonstrates a huge divergence in company disclosures on workplace mental health reporting. During the benchmark engagement process, several companies commented that this was the first time they had been asked to share information on their approach to workplace mental health. This suggests that workplace mental health is not yet integrated into investor ratings or corporate engagement activities, nor is it included in broader corporate sustainability reporting frameworks. Despite many companies paying management attention to the issue, formalised reporting is yet to play an important role.

Consequently, companies that engaged with CCLA broadly welcomed the benchmark, with a number noting that it provides a clear and credible disclosure framework that sets out the expectations of investors and other stakeholders on corporate management and reporting of workplace mental health.

Detailed findings from the pilot assessments are provided in Appendix 3.



Spread of scores between the 30 assessed companies

Chapter 4

Recommendations for companies and investors

How can companies start to institutionalise mental health in their organisation?

- Establish an overarching policy on workplace mental health setting out the reasons why workplace mental health is important to the business and describing the processes in place to ensure the policy is effectively implemented. Demonstrate how this policy intersects with issues linked to 'good work' principles (e.g. diversity, equity and inclusion, fair pay and financial security, workplace adjustment etc.).
- 2. Encourage open and transparent dialogue about mental health. Signal the company's leadership commitment to workplace mental health via a CEO statement.
- Define responsibilities at the senior management (oversight) level and at the operational level – for the implementation of the company's workplace mental health policy or policies.
- 4. Set objectives (or define outcomes) for the company's efforts on workplace mental health.
- 5. Measure and report annually on the effectiveness of your mental health programme and initiatives. As part of this, consider external frameworks alongside internal employee engagement tools to evaluate employee views on workplace mental health.

How can investors support companies on their mental health journey?

- Ensure companies are aware of the CCLA Corporate Mental Health Benchmark.
- 2. Encourage companies to use the benchmark to review/structure their approach to mental health.
- 3. Encourage companies to establish formal mental health policies on workplace mental health setting out the reasons why workplace mental health is important to the business and describing the processes in place to ensure the policy is effectively implemented. Companies should also demonstrate how this policy intersects with issues linked to 'good work' principles (e.g. diversity, equity and inclusion, fair pay and financial security, workplace adjustment etc.).
- 4. Encourage companies to survey their employees on the company's approach to mental health, and to use this information to target resources most effectively.
- 5. Encourage companies to report on the effectiveness of their workplace mental health programmes. For example, the uptake of an employee assistance programme, the percentage/number of line managers trained on mental health, or the investment dedicated to workplace mental health initiatives.

Chapter 5 Next steps

CCLA plans to fund the expansion of the benchmark into 2022. The next phase will assess the 100 largest:

- 1. UK-listed companies (with a minimum workforce threshold), to be assessed in March 2022
- 2. global-listed companies, to be assessed in April 2022.

A wider scope will allow comparison within and between sectors and ultimately geographies. Being able to understand the relative strengths and weaknesses of corporate practice on workplace mental health will inform and accelerate progress toward safeguarding employee mental health in the workplace.

The Expert Advisory Panel will convene in January 2022 to agree any revisions to the benchmark methodology and assessment criteria. The revised assessment criteria will be published in February 2022, ahead of UK 100 assessment process in March.



Appendix 1 Research and resources

BSI. 'Health and Wellbeing in the Workplace.' Online at www.bsigroup.com/globalassets/ localfiles/en-nz/45001/health_and_ wellbeing_whitepaper_bsi0251_1903_nz.pdf

Burton, J. (2010), 'WHO Healthy Workplace Framework and Model: Background and Supporting Literature and Practice.' Online at www.who.int/occupational_health/ healthy_workplace_framework.pdf

CIPD. 'Wellbeing at Work Guides.' Online at www.cipd.ie/news-resources/practicalguidance/guides/well-being-work

City Mental Health Alliance. 'Global Thriving at Work Framework.' Online at https:// cmhaa.org.au/img/cmha-global-thriving-atwork-framework-final.pdf

City Mental Health Alliance. 'Thriving at Work UK Guide: A Guide to Creating Mentally Healthy Workplaces.' Online at https:// citymha.org.uk/Resources/Thriving-at-Work-UK-Guide

Deloitte (2017) 'At a Tipping Point? Workplace Mental Health and Wellbeing.' Online at https://www2.deloitte.com/ content/dam/Deloitte/uk/Documents/ public-sector/deloitte-uk-workplace-mentalhealth-n-wellbeing.pdf

Deloitte (2020) 'Mental Health and Employers: Refreshing the Case for Investment.' Online at https://www2.deloitte. com/uk/en/pages/consulting/articles/ mental-health-and-employers-refreshingthe-case-for-investment.html ISO 37001 Occupational Health and Safety Management — Psychological Health and Safety at Work. Online at https://iosh. com/media/4730/iosh-mh-benchmarkingquestions-v2.pdf

Stevenson, D. and Farmer, P. (2017), 'Thriving at Work: The Stevenson/Farmer Review of Mental Health and Employers'. Online at https://assets.publishing.service.gov. uk/government/uploads/system/uploads/ attachment_data/file/658145/thriving-atwork-stevenson-farmer-review.pdf

Time to Change Employer Pledge. Online at www.time-to-change.org.uk/take-action/ resources-your-workplace/employer-pledge

The Mental Health Work Commitment. Online at www.mentalhealthatwork.org.uk/ commitment/

Willis Towers Watson (2020) 'The Mounting Crisis of Mental Health.' Online at: https:// www.willistowerswatson.com/en-GB/ Insights/2019/11/the-mounting-crisis-ofmental-health

Corporate Commitments

Global Business Collaboration for Better Workplace Mental Health

The Mental Health at Work Commitment

Time to Change Employer Pledge (Closed)

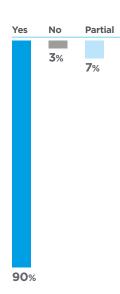
Appendix 2

List of companies covered by the 2021 pilot benchmark

Company name	Market capitalisation (£m)	Number of employees (disclosed in latest annual report)	Sector
Anglo American	38,467	64,000	Energy
Ashtead Group	23,336	18,809	Industrial
Associated British Foods	17,765	133,000	Consumer staples
AstraZeneca	109,248	76,100	Health care
Aviva	16,302	29,600	Financials
BAE Systems	17,100	34,100	Industrials
Barclays	29,368	83,000	Financials
BHP Group	43,983	80,121	Materials
BP	65,627	63,600	Energy
British American Tobacco	63,606	55,329	Consumer Staples
BT Group	20,361	102,037	Communication Services
Compass Group	27,268	548,143	Consumer Discretionary
CRH	28,397	76,600	Materials
Diageo	81,551	27,650	Consumer staples
Experian	25,900	17,800	Financials
Ferguson	21,935	35,000	Materials
GlaxoSmithKline	70,903	94,066	Healthcare
Glencore	41,318	87,822	Energy
HSBC Holdings	85,973	226,000	Financials
Lloyds Banking Group	33,352	61,576	Financials
National Grid	32,670	23,683	Energy
NatWest Group	23,755	59,900	Financials
Prudential	37,337	41,671	Financials
Reckitt Benckiser Group	46,139	43,500	Industrials
RELX	37,322	33,200	Industrials
Rio Tinto	73,942	47,500	Energy
Royal Dutch Shell	60,394	87,000	Energy
Tesco	17,241	367,321	Consumer staples
Unilever	111,415	150,000	Consumer staples
Vodafone Group	36,415	96,506	Communication services

Appendix 3 Detailed results

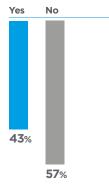
Management commitment and policy



Is workplace mental health recognised as an important business issue?

A positive finding from the pilot benchmark is that 27 of the 30 companies assessed recognise mental health as an important business issue, with many articulating the business risks and opportunities that can present through mental health in the workplace. These companies recognise that mental health has a significant impact on organisational health and success. The business drivers are wide yet are commonly described as employee fulfilment and engagement, optimised productivity, reductions in sickness and absence, and delivering a duty of care to employees on their health, safety and wellbeing. Recognition and acknowledgment are an important first step towards developing and implementing an effective approach to the management of workplace mental health, and these results indicate that most companies are aware that the management of workplace mental health is a business imperative, even if they have yet to formalise the approach in a formal policy statement (or equivalent).

As highlighted in Chapter 3, it is evident that the impact of Covid-19 has played a pivotal role in accelerating management attention to this issue. The pandemic has created unprecedented changes in the operating practices of companies which have necessitated responsive actions from management teams. It will be interesting to see whether workplace mental health will continue to receive a sustained level of management attention over the coming years.



Do CEOs signal the company's leadership commitment to workplace mental health?

CEOs can play a critical role in driving a culture of openness and transparency about mental health through signalling their company's leadership commitment to workplace mental health. Of the 30 companies assessed, 13 publish evidence of a statement from the CEO on this issue.

During the company review period some companies provided internal examples of CEOs signalling the company's approach to workplace mental health. However, the benchmark gives credit to CEOs that have made public statements to promote the corporate approach, encourage supportive and accessible behaviours, and act to remove any stigma attached to mental health in the workplace.

Of the 43% of companies making public CEO statements, examples include the CEO acting as signatory to initiatives or a policy statement, statements within the annual report (Chief Executive Report), hosted video events, and published news articles. Within these, there are several examples of leaders not only discussing corporate commitments to workplace mental health but acting as strong allies and sharing their personal stories of ill-health.

Do companies publish overarching corporate mental health policies (or equivalent)?

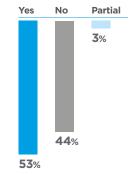
Whilst the existence of a policy may not provide a guarantee of implementation, the absence of a policy is a clear sign that workplace mental health is not firmly on the corporate agenda. Of the 30 companies covered by the pilot benchmark, 16 companies (53%) have a formalised policy statement (or equivalent), including detail on how the policy is to be implemented.

To score maximum points for this question, we would expect companies to include the following in their policy statement (or equivalent):

- A clear statement of the reasons why workplace mental health is important to the business (including both the business case and the ethical case for action).
- A commitment to compliance with relevant legislation.
- A clear position regarding expected standards of workplace mental health.
- A description of the processes in place to ensure that the policy is effectively implemented (e.g. senior management oversight, commitments to continuous improvement, performance monitoring, corrective action if the policy is not being effectively implemented).

- A commitment to continuous improvement and public reporting on performance.
- Signpost to other corporate commitments which support mental health and good work, such as diversity and inclusion, fair pay, employee consultation, career progression.

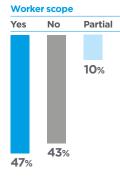
For those companies scoring maximum points, we found that the form of the mental health policy statement (or equivalent) varied. Some companies incorporate mental health within a published health and safety or health and wellbeing policy. Points were only awarded if the policy makes clear that mental, as well as physical, health is covered. The assessment process found that the term 'wellbeing' is widely used and is often interchangeable with mental health. However, given that 'wellbeing' has no universal definition, and can apply to both physical and mental states, we would expect companies to clarify their use of the term and its scope. Several companies publish employee health and wellbeing frameworks, which include mental health as a key pillar, typically alongside physical, lifestyle, financial and/or emotional considerations.

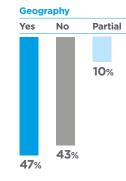


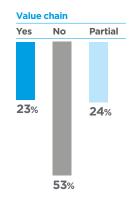
Do mental health policies provide a clear explanation of scope?

Understanding the scope of a policy is important to understanding the breadth of a company's commitment to action on workplace mental health. Companies are expected to apply a universal approach to managing workplace mental health covering all workers, including contingent workers (e.g. contractors, interns, gig workers, temporary staff, etc.), and all relevant geographies in which the company operates.

14 of the companies assessed provide a clear explanation of worker scope to confirm that policy commitments extend beyond employees to include contingent workers, and the same proportion of companies provide a clear description of the geographic scope of their policy commitments. Those companies that do not provide a clear explanation of worker or geographical scope leave it unclear as to whom corporate commitments on mental health extend to. It is good practice for companies to include business partners (e.g. suppliers, customers) in scope of their mental health policies. Seven of the companies assessed indicate that mental health strategies extend beyond the workforce to suppliers, customers and/ or communities. Examples include public campaigns to break stereotypes around mental health stigma, providing customers or suppliers with access to financial support, funding community projects and the provision of mental health guidance or support services.







Do companies publish a clear management commitment to encouraging a culture of openness on mental health?

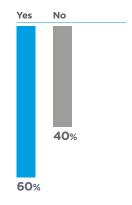
A culture that encourages openness and dialogue on mental health and works towards eliminating stigma will support the effectiveness of a company's workplace mental health strategy and its implementation.

This question looks for companies that make clear statements that indicate management commitment to develop a culture which:

- proactively changes the way people think and act about mental health by raising awareness and challenging mental health stigma.
- encourages two-way conversations about mental health and highlight the support available at all stages of employment.
- empowers employees to champion mental health and positively role model mental health in the workplace.

• encourages openness during recruitment and throughout employment and allows reasonable adjustments to be made.

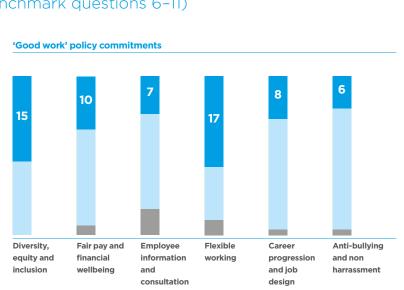
Encouragingly, 18 of the companies assessed provided a commitment to openness and dialogue on mental health through charter statements, through leadership pledges or through mental health-related objectives. We noted that of the 12 companies that did not score, many demonstrated initiatives and programmes that are designed to support an open culture. However, to score points for this question, we require evidence of a formal management commitment to encouraging a culture of openness and dialogue on mental health.



Good work policy statements (benchmark questions 6-11)

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. The benchmark identifies six 'good work' components and looks for policy commitments in these areas that are explicit in their link to workplace mental health. Partial scoring is provided where there is clear policy commitment but no link to workplace mental health.

Best practice can be found across all six components; that is clear management statements which are explicit in linking to mental health. Notably, not one of the companies assessed scored maximum points across all six components. The highest scoring areas were flexible working and diversity, equity and inclusion (DEI) where half or more of the companies (17 and 15 companies respectively) scored maximum points.



Clear policy commitment with explicit link to workplace mental health

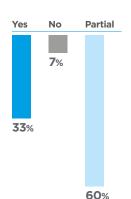
Clear policy commitment

Limited evidence of policy commitment



Do companies publish formal commitments to diversity, equity and inclusion (DEI) that establish a clear link to workplace mental health?

A clear position on diversity and inclusion demonstrates that a company values the benefits that differences bring and is committed to fair and equal treatment of people. A diverse work culture that resembles the diversity that exists in society can support talent attraction and retention, innovation and idea exchange, and service levels. DEI has received additional board attention in recent years, accelerated by investor interest in companies setting representation targets, and heightened public interest in and support for social movements, such as 'Black Lives Matter'. Best practice diversity and inclusion programmes recognise the importance of DEI in fostering a culture of good workplace mental health. 15 of the companies assessed publish DEI statements that explicitly link to mental health. These companies demonstrate that providing a diverse, equitable and inclusive workplace supports mental health generally, and means that no employee should feel excluded because of their mental health.



Do companies publish formal commitments to fair pay and financial wellbeing which establish a clear link to workplace mental health?

Employers play an important role in improving their workforce's financial wellbeing. This includes paying people enough and fairly; offering secure, good quality jobs; and providing benefits which extend the value of their pay. It is good practice to also support employees to make good choices around spending, saving, and investing through financial guidance and education.

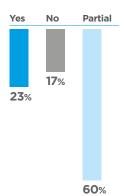
Just ten of the companies assessed have published a formal policy which recognises the link between financial wellbeing and mental health. These companies recognise the impact that financial concerns can have on mental health and not only commit to being a fair and equitable employer in terms of pay, but also take a broader approach to supporting financial wellbeing. Examples of such support includes providing tools and services to support financial management and long-term planning, management generally, but also specialist support in times of financial distress and considering the mental health impact of job insecurity.

Perhaps unsurprisingly, companies in the financial services sector performed well in this area, typically extending support beyond employees to suppliers and other stakeholders along the value chain. One of the assessed companies has produced a film in partnership with the Money and Mental Health Institute, which explores how money and mental health is connected.

Do companies publish formal commitments to employee information and consultation which establish a clear link to workplace mental health?

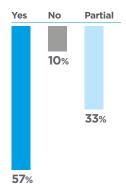
Consultation involves employers not only giving information to employees but also listening to them and taking account of what they say before making decisions on key business matters. Whilst there are certain scenarios (such as redundancy), where employers are legally obliged to inform and consult with employees, companies that take a broader approach to employee consultation and representation are likely to benefit. With increased employee engagement and a positive working environment, individuals and organisations can thrive.

Seven of the 30 companies assessed make a clear link between promoting the principle of 'good work' through consulting with employees on a wide range of matters, including business strategy, culture, values and health initiatives.

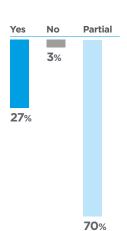


Do companies publish formal commitments to flexible working that establish a clear link to workplace mental health?

Flexible working can benefit all employees, including those with caring responsibilities. Workplaces that give permission to have a work/life balance and endorse flexible working allow workers greater control over balancing work commitments with non-work demands. Like the question on DEI, a majority (17) of the companies assessed recognise the link between flexible working and supporting mental health. Though again we recognise the impact of Covid-19 which has clearly accelerated attitudes and systems for flexible working.

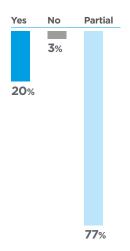






Do companies publish formal commitments to career progression and job adjustment that establish a clear link to workplace mental health?

Healthy workplaces support employee wellbeing throughout an individual's career by offering opportunities to progress and enhance career pathways. In addition, through providing opportunities to make reasonable adjustments to work schedules, duties and loads when managing mental ill-health. This question was looking for companies that provide for good career progression but also allow for times when adjustments to roles or other support may be needed. Eight of the 30 companies assessed demonstrate a clear link between career progression, workplace adjustment and mental health. Such examples include a commitment to incorporate mental health in performance review processes and providing adjustments to roles or work schedules as needed.



Do companies publish formal commitments to anti-bullying and non-harassment that establish a clear link to workplace mental health?

Difficult relationships at work can be stressful and make a job harder to cope with. Key frameworks and publications on workplace mental health, such as Mind's Workplace Wellbeing Index, Thriving at Work and Deloitte's Mental Health and Employers agree that good work consists of the absence of bullying and harassment. Companies are expected to have a clear policy and organisational practices aimed at mitigating the risk of negative behaviours and acting appropriately when incidents occur. Only six of the companies assessed reinforce the link between anti-bullying and non-harassment and workplace mental health in policy statements.

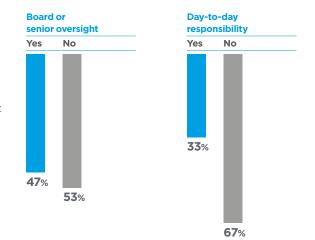
Governance and management

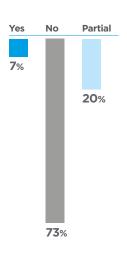
Do companies define responsibility for workplace mental health?

It is important to understand who has overall responsibility for the implementation of the company's mental health policy, and who has responsibility for workplace mental health on a day-to-day basis. Both oversight and implementation are important.

In large public companies the oversight of policy - which includes defining the overall policy goals, monitoring the implementation of the policy, acting in the event the policy is not being complied with and ensuring the policy remains relevant to the organisation - is generally the responsibility of senior management and/or the board. In these companies, day-to-day (or operational) implementation responsibility is usually allocated to a specific individual or team. These individuals or teams are generally required to ensure the effective implementation of the policy (e.g. developing and implementing management systems and processes, setting objectives and targets, measuring and monitoring performance, and reporting).

The pilot results indicate that many companies have yet to formalise their management of workplace mental health. Just ten of the companies assessed have published details of who is responsible for the day-to-day management of workplace mental health, and 14 companies publish details of assigned senior management oversight of workplace mental health.

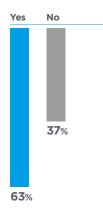




Do companies set objectives for the management of workplace mental health?

Objectives are the point where policy commitments are translated into action, and where resources and responsibilities are allocated for the delivery of these objectives. Investors place great value in published objectives as a sign of a maturing approach to an issue.

Objective setting appears be a relatively under-developed area of workplace mental health management, although during the company review stage, several companies indicated that objectives and metrics were used internally but were not yet reported on externally. Only two of the companies assessed publish clear mental health-related objectives and set out the steps that will be taken to achieve them. A further six companies provided objectives but with limited information on how these are to be achieved. Objectives related to expanding the scope of mental health initiatives, reducing the stigma associated with mental health, investing in programmes to support the proactive management of mental health and development of reporting and performance metrics.

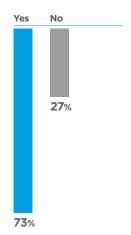


Do companies provide mental health training to line managers and individuals with assigned responsibilities for mental health?

The effective implementation of a workplace mental health policy relies on managers and dedicated individuals to oversee the implementation of the policy. Those trained in mental health awareness are better equipped to listen, reassure and respond to someone experiencing mental ill-health; this approach means that there are people within an organisation who are more likely to spot early signs of distress, more able to sign-post individuals to relevant support resources, and are capable of giving advice that might prevent mental health concerns developing into serious harm and long-term sickness. 19 out of the 30 companies assessed currently provide training to line managers and/or to dedicated individuals such, as mental health first aiders or champions. This indicates that many companies recognise the importance of creating a supportive culture in managing workplace mental health, and are investing resources to encourage positive mental health in the workplace and to help individuals who are experiencing poor mental health to know that there are people within the organisation in whom they can confide.

Do companies provide educational training to increase the mental health literacy of all workers?

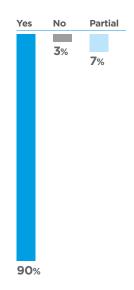
Workplace mental health is reinforced when workers are supported to take steps to improve, protect or maintain their own mental health. This question was looking for evidence of companies acting to increase the mental health literacy of workers by providing opportunities for them to learn about proactive mental health management. Training is a common area of investment amongst the companies assessed, with 22 out of 30 providing awareness initiatives such as on-site training, virtual learning experiences, guidance libraries and employee support networks. Commonly, the annual World Mental Health Day (10 October) provides an opportunity for companies to communicate their awareness of workplace mental health and to sign-post employees to initiatives such as peer-to-peer networks and guidance.

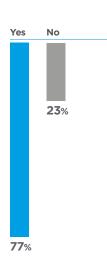


Have companies developed formal initiatives or programmes to raise awareness of mental health in the workplace?

In addition to having a clear policy on mental health in the workplace, companies should develop and deliver systemic programmes of activity that support the management of mental health in the workplace.

With 27 of the 30 companies assessed evidencing formal initiatives or programmes, the pilot benchmark results indicate that companies are investing in workplace mental health. Not surprisingly, many companies' actions are linked to the Covid-19 pandemic (through providing additional support for key workers and mental health support resources for home-workers). However, several companies show mature and organisation-wide initiatives that provide critical clinical support through, for example, telemedicine apps and access to clinicians, and that encourage proactive, preventative behaviours, through, for example, personal resilience and mindfulness training and workload management. Some companies promote the key role of colleague/peerto-peer networks in supporting mental health generally. Others offer training or employment opportunities to distinct groups with mental health issues, such as ex-military personnel suffering from Post-Traumatic Stress Disorder.

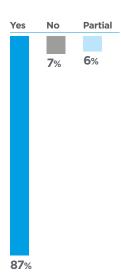




Has the company developed formal initiatives or programmes to raise awareness of mental health within the value chain?

This criterion awards additional points to companies publishing details of initiatives that extend beyond the workforce to value chain partners.

23 out of the 30 companies assessed report initiatives aimed at supporting customers, suppliers or communities. Examples are wide-ranging and include campaigns to tackle social anxiety, improve self-esteem, build young people's resilience; financial guidance and preferential payment terms for SMEs; funding and support for communities facing hardship caused by the pandemic; and mental health support for survivors of gender-based violence.



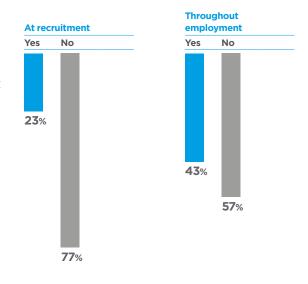
Does the company provide access to mental health services and support either internally or externally?

In addition to having a clear policy on mental health in the workplace, companies are expected to develop and deliver a systemic programme of activity that supports the management of mental health in the workplace. 26 of the companies assessed provide worker access to mental health support services. Such services include employee assistance programmes (EAP) providing features such as 24-hour, 365-day multi-channel accessibility and support for specific mental health concerns and significant life events such as illness, bereavement, divorce and financial distress. Companies also provide access to psychological services without the need for a GP referral, innovative technological approaches such as telemedicine and video counselling. Many companies reported an uptake in EAP in 2020 because of the pandemic and related national lockdowns.

Does the company encourage openness about mental health and offer appropriate workplace adjustments to workers who require them?

Companies should adopt a holistic approach to mental health and consider what support can be provided at all stages of an individual's career with the company. Mentally healthy workplaces design recruitment and on-boarding systems with accessibility in mind, enabling individuals with existing mental health conditions to access employment opportunities and to request appropriate workplace adjustments such as skills-training, management support and flexible working. Line managers should consider employee mental health at all stages of an individual's career, including during induction, performance management reviews, promotion opportunities, team meetings and return-to-work meetings.

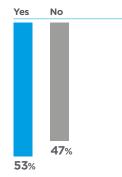
7 out of the 30 of the companies assessed report that support for mental health is provided at the recruitment stage. 13 companies report that mental health is considered during employment, citing initiatives such as return to work guidance for managers, monitoring of stress-related absence (where legally permissible), peerto-peer networks, and regular check-in conversations with employees. Several companies report on accessibility and adjustment considerations in relation to a disability. However, in the descriptions provided, it was not clear that mental health was included in the companies' definitions of disability; in most instances, the programmes appeared geared to individuals presenting with a physical disability.



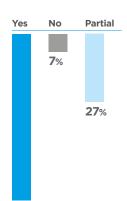
Are employees given the opportunity to participate in the design or development of workplace mental health initiatives?

It is good practice for companies to encourage and enable employees to participate and contribute to the design or development of internal mental health initiatives. This will strengthen a culture of openness and support progression on workplace mental health.

16 out of the 30 companies assessed reported mental health initiatives which allow for employee involvement. These include a peer-to-peer support network developed and run by volunteers that have lived experience of ill-health, employee listening groups that have increased accessibility in the workplace and initiated new products and services, employeedesigned suicide prevention programmes and, in response to pulse data indicating increased anxiety, facilitated conversations by leadership on mental health.



Do companies have a formal process for measuring employee engagement and use information to support workplace mental health measurement and initiatives?



66%

Effective systems to measure employee engagement provide a near real-time measurement of employee engagement and satisfaction and can provide powerful insights to management. Meaningful employee engagement data can support the implementation and adjustment of a company's mental health strategy. 20 out of the 30 companies assessed describe formal processes for measuring employee engagement and indicate how this data supports mental health strategy. Good practice examples include using insights from weekly SMS or online health checks during national lockdowns to identify areas of concern, including domestic abuse and burnout, and initiating regular conversations with members of the leadership team on mental health following Pulse and EAP data which indicated rising levels of anxiety amongst employees.



Do companies conduct third party assurance of mental health strategy and practices, or observe recognised frameworks?

Mental health assurance or accreditation schemes provide frameworks for managing workplace mental health and support companies to progress and test their approach. They can also play an important role in promoting higher standards and driving best-practice. Only two companies reported alignment or testing of their mental health approach with recognised frameworks and/or standards including Mind's Workplace Wellbeing Index. We note that the newly launched global ISO45003 standard on Occupational Health and Safety Management (which also covers psychological health and safety at work) may be useful to companies in the future who are looking to certify their workplace mental health management systems. However, our general view is that workplace mental health is not yet evolved as a management approach to the stage at which third party assurance is expected.

Leadership and innovation

Do companies participate in industry initiatives or partnerships aimed at promoting positive mental health in the workplace? Are customers or suppliers involved?

Workplace mental health is a collective issue for businesses as well as an individual issue for companies to manage. Making progress and raising standards across the UK requires individual companies to support research and development programmes to improve workplace mental health, to share their knowledge and expertise with their industry peers, to play a supportive role in public policy debates around workplace mental health, and to support industry and stakeholder initiatives directed at improving workplace mental health. Companies that share knowledge across their value chain are considered as leading the field.

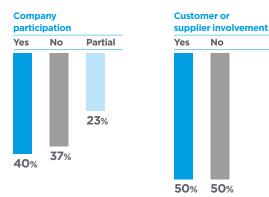
12 of the 30 companies assessed reported their participation in industry initiatives or partnerships which seek to promote and improve mental health in the workplace.

To receive a maximum score, companies needed to demonstrate not only that the initiatives had a meaningful mental health dimension but that the company had played a significant role in the initiative. That is, companies had to demonstrate that they are dedicating significant time, resource or expertise to the initiatives in question.

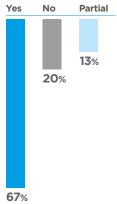
Some leading company examples include:

 Founding partner of Heads Together, an initiative which campaigns to tackle the stigma around mental health and raises funds for a series of innovative mental health services.

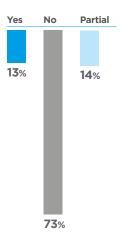
- Partnering with the Business Disability Forum to access the support required to evolve knowledge on mental health in the workplace and sponsorship of a toolkit.
- Founding partners to 'The Global Business Collaboration for Better Workplace Mental Health'. Launched in January 2021, this is a businessled initiative which advocates for, and looks to accelerate, positive change for mental health in the workplace globally.
- Partnering with a mental health charity to distribute mobile devices and increase accessibility to financial support services.
- Using consumer brands to promote mental health and resilience to customers.
- Founding patron of the National Emergencies Trust helping over 13,000 charities get food, shelter and mental health support to millions of people in need.







Openness and transparency on workplace mental health should be seen across the organisation. Communications that promote a company's mental health initiatives and provide an opportunity for the workforce to discuss mental health and share personal stories will strengthen culture and management of mental health in the workplace. 24 of the companies assessed evidenced employee communications related to mental health, the majority of these companies providing multiple examples across various channels, a few providing just a single communication on workplace mental health (commonly recognition of World Mental Health Day). Examples include live LinkedIn events, story-telling films, social media posts supporting awareness initiatives, and personal stories and photos promoting corporate mental health initiatives on the company website.



Is the company a recognised thought leader on its approach to corporate mental health practices?

Companies leading the field on workplace mental health can promote good practice through external recognition in the form of awards, publications or presentations which promote good practice and encourage others to adopt similar approaches. There are various schemes such as The Great British Wellbeing Awards, The UK's Best Workplace, Mind's Wellbeing Index Awards, and the Mindful Partners Workplace Mental Health Awards, which follow a rigorous process of selection.

Whilst such schemes may incur an applicant fee (typically to cover the cost of shortlisting and judging entries), it is also true that some award schemes have been designed primarily as income generators, requiring companies to pay a fee for entering and/or for collecting an award. There is a concern that such schemes positively bias companies who are willing to pay to be recognised for their efforts, whilst excluding companies who may be 'best in class' but excluded for financial reasons. We look carefully at the types of award schemes that have been cited and recognise companies for receiving recognition from organisations that are reputed as offering a fair and rigorous process of selection.

Companies may also be recognised for their leadership on workplace mental health through industry presentations or publications involving suppliers or customers. Four of the companies scored points for reporting on external recognition of their leadership on mental health. It is important to clarify that to score points, the award or thought leadership activity must be directly reported by the company and not through a third party. During our company review phase, some companies provided evidence of exemplary thought leadership publications and presentations, yet these details were not published on the company's website or in its publications, so did not score.

Performance reporting and impact

Do companies publish their mental health approach in the annual report?

All of the companies published workplace mental health disclosures in their annual report, although the quality of reporting varied considerably. Most disclosures related to the impact of Covid-19 and companies' actions to respond to the need to safeguard the physical and mental health of their workforces during a period of significant change, disruption and uncertainty.

The annual report is a key channel for corporate disclosure. Made available to shareholders and other stakeholders, it is used to evaluate a company's performance and to make investment decisions.

Companies are expected to publish details of their key management priorities during the year. It is therefore of no surprise that workplace mental health was so comprehensively reported in 2020-21.

This guestion did not evaluate companies on the quality of their reporting as it was designed to track the presence of mental health reporting to shareholders and other key stakeholders. As we look past the pandemic, it will be interesting to see if companies continue to use the annual report to detail the impact of their workplace mental health strategies.

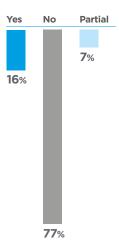


100%

Do companies report on progress against mental health related objectives?

Objective setting and reporting appear be a relatively under-developed area of workplace mental health management. This question was only scored if companies had reported objectives for managing mental health in the workplace. Six of the companies assessed provide some reporting on

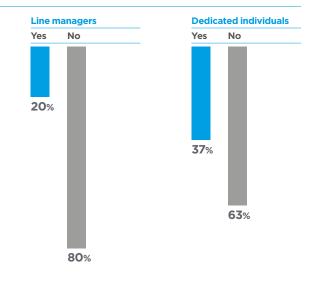
progress against their objectives, including increased scope of mental health initiatives, increased investment in workforce and/ or value chain programmes, development of reporting and performance metrics and increased leadership training.

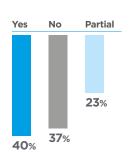


Do companies report on the proportion of line managers or dedicated individuals trained on workplace mental health?

The effective implementation of mental health strategy and practices relies on managers, and other dedicated individuals, who are competent and confident to oversee delivery initiatives and to support the workforce to talk openly about their mental health thus reducing stigma and promoting early intervention.

Whilst 19 of the companies assessed disclosed that they provide mental health training, only six report the number of line managers trained each year and 11 report the number of trained dedicated individuals (typically mental health first aiders or champions). Investors place value in companies that provide transparent reporting and we encourage companies to record and disclose training initiatives.





Do companies report on the uptake of mental health programmes and initiatives?

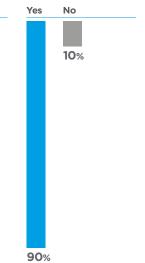
The effective implementation of a mental health strategy and practices relies on the effective communication and delivery of initiatives and programmes.

Of those assessed, 12 companies provide comprehensive reporting on the uptake of mental health initiatives and programmes, and seven provide partial reporting linked to a single initiative or limited data. Examples include engagement levels in awareness days, attendance at mental health workshops, uptake of Thrive/ Headspace apps, the number of employees accessing preventative health screening including mental health, registration levels for company mental health portals, and the number of employees sharing personal stories on mental health.

Do companies report on the proportion of the workforce that participate in employee engagement programmes/surveys?

Data from engagement surveys can support the effectiveness of workplace mental health strategy and the design of initiatives. Companies are expected to report on the uptake of engagement surveys and on how they are using this data to inform management decision-making.

Of the companies assessed, 27 report on participation levels in employee engagement surveys generally. As identified in an earlier criterion, 20 companies carry out employee engagement initiatives that explicitly link to workplace mental health. To increase the usefulness of the results to an investor audience in assessing workplace mental health strategy, this question is likely to evolve to assess companies that report specifically on the proportion of the workforce participating in surveys and engagement activities linked to mental health.



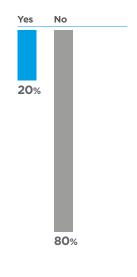
Do companies use key performance indicators (KPIs) to measure and report on the impact of workplace mental health strategies?

Companies that identify the importance of good workplace mental health and adopt appropriate strategies and practices which positively impact workplace mental health are encouraged to develop metrics to demonstrate performance.

Mental health management is a complex matter and health data is sensitive. However, companies can and should look to adopt metrics that reflect their organisations' approach to managing mental health in the workplace. Companies are likely to use a combination of qualitative and quantitative indicators, such as engagement levels in health surveys, data responses, reduction in sickness absence linked to mental health factors such as stress, turnover and morale.

Just six of the companies assessed report mental health-related KPIs. This result reflects that many of the companies assessed have yet to formalise their approach to measuring workplace mental health. One company reports that it launched a mental health and disability inclusivity programme and has since received increased mental health self-identification data (evidence of an effective open culture), in turn enabling further development of its workplace mental health strategy. Another company uses wellbeing analytics and return on investment data to determine the progress and impact of mental health activities.

It is evident that this is an under-developed area and there is not a clear consensus on how workplace mental health should be measured. For this reason, the benchmark is not seeking to prescribe what types of KPIs should be reported. Instead, the benchmark seeks to monitor company reporting and share details of tangible examples used by companies so that we can build a body of knowledge on the types of metrics used by companies to meaningfully measure workplace mental health.



Glossary

Mental health

Mental health is not the same as 'mental ill-health'. It is a continuum that includes emotional wellbeing, mental health conditions and mental illness. We all have mental health, just as we all have physical health. The World Health Organisation defines good mental health as: 'a state of wellbeing in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully and is able to make a contribution to his or her society.'²¹

'Poor mental health' includes the full spectrum, from common mental health conditions such as anxiety and depression, to more severe illnesses, such as bipolar and schizophrenia.

Mental health at work

'Mental health at work' includes not only mental health problems that have been caused by work, but also those that are brought to and experienced in the workplace.²²

Work-related stress

Work-related stress is the response people may have when presented with work demands and pressures that are not matched to their knowledge and abilities and which challenge their ability to cope. Stress occurs in a wide range of work circumstances but is often made worse when employees feel they have little support from supervisors and colleagues, as well as little control over work processes.²³

Healthy workplace

Definitions of a 'healthy workplace' have evolved over past decades, from an almost exclusive focus on the physical work environment (traditional occupational health and safety, dealing with physical, chemical, biological and ergonomic hazards), to a much broader definition, that includes lifestyle and psychosocial factors as well. The World Health Organization's definition of a healthy workplace is one in which workers and managers collaborate to use a continual improvement process to protect and promote the health, safety and well-being of workers and the sustainability of the workplace by considering the following, based on identified needs:

- health and safety concerns in the physical work environment
- health, safety and well-being concerns in the psychosocial work environment including organization of work and workplace culture
- personal health resources in the workplace, and
- ways of participating in the community to improve the health of workers, their families and other members of the community.²⁴

Good work

We recognise that employment can have a positive impact on an individual's mental health and that good work is good for mental health.²⁵ Good work can help prevent new mental health problems and support those with existing conditions to get on in work and thrive.²⁶

The benchmark recognises the components of good work as diversity, equity and inclusion, flexible working, fair pay and financial wellbeing, employee information and consultation, career progression and job design and the absence of harassment and bullying in the workplace.

Endnotes

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Disclosure

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