

23<sup>rd</sup> May 2019

## **CWU Response to the NICE Suicide Prevention Quality Standard Consultation**

### **Introduction**

1. The Communication Workers Union (CWU) is the largest union in the communications sector in the UK, representing approximately 192,000 members in the postal, telecoms, financial services and related industries.
2. The CWU welcomes the opportunity to respond to the National Institute for Health and Care Excellence (NICE) suicide prevention quality standard consultation. The CWU has campaigned over many years for more action and investment in mental health and suicide prevention services. We have also worked with charities including MIND, Rethink Mental Health, 'Time to Change', the Samaritans, CALM and Papyrus to encourage more of our members to get help and support if they have active suicidal thoughts or plans or if they have been affected by suicide.
3. The CWU has supported and signed the 'Time to Change' Charter which commits employers to supporting employees with mental ill-health and opposing stigma. We have also signed the 'Dying to Work' Charter to protect workers with a terminal illness diagnosis to ensure they retain the ability to remain in work for as long as they wish. This also avoids additional stress, anxiety and mental health issues being heaped on those affected and risking accelerating the progression of their illness. The CWU signed both Charters with Royal Mail Group and we believe NICE should be recommending that all employers sign up to these charters.
4. Government austerity, the growth of insecure work, falling living standards, rising inequality and increased debt are pushing more people into depression and despair. Although the overall UK suicide rate has fallen since the 1980s and 1990s, evidence suggests that there has been a rise in work related suicides in the face of growing pressures at work. It is appalling and shameful that there are nearly 6,000 suicides in this country each year. Much more can and must be done to tackle this tragic situation, which is a major public health issue, with suicide the leading cause of death in adults below the age of 50.<sup>1</sup>

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<sup>1</sup> Suicides in the UK: 2017 registrations, Office for National Statistics, 4<sup>th</sup> September 2018; and Suicide by Occupation, England: 2011 to 2015, Office for National Statistics, 17<sup>th</sup> March 2017

## **The need for employer and union involvement in the NICE quality standard**

5. The CWU supports the NICE quality standard and the overall objective for local organisations to combine their expertise and resources to implement a range of interventions to prevent suicide.
6. However, we consider that the absence of employers and trade unions from the standard represents a major limitation, and we believe it is important that they are involved. Employers - working with trade unions - are extremely well placed to support multi-agency suicide prevention partnerships in the community by sharing information about individuals at risk where their consent is given. They can also help to reduce the risk of suicide amongst their employees by adopting best practice guidelines in the workplace.
7. For example, employers can support the aim of reducing access to methods of suicide, and reducing the opportunity for suicide in locations where suicide is likely, such as in the workplace. They can assist in providing information about how and where people can get help when they feel unable to cope, and taking measures to monitor those who may need help.
8. In the same way that people with active suicidal thoughts are asked if they would like their family or carers to be involved in their care, those individuals should also be asked if they want their employer to be involved. Where this is the case, there should be an automatic obligation on the employer to take steps to support those who are affected.

## **Work related mental ill health and suicide**

9. Not only are employers well placed to assist in the prevention of suicide, but they should be under an obligation to do so because of the enormous influence of work on mental wellbeing and suicide. Where labour standards are good and workers are treated fairly, work is usually very positive for mental health. Sadly, the opposite is true for too many workers who are in poor quality, precarious, stressful and low paid jobs. A major survey of 44,000 people by the mental health charity Mind last year revealed that poor mental health at work is widespread, with half of all people surveyed saying they have experienced a mental health problem in their current job.<sup>2</sup>
10. Whilst poor working conditions in the UK have led to suicides, these cases remain officially invisible, as suicide is not recognised in legislation as a work-related accident. Evidence from countries where work related suicides are recorded points to a steep rise in workplace suicides in the context of deteriorating working conditions, increased job insecurity and work intensification. This has been shown in recent studies carried out in the United States (Tiesman et al., 2015), Australia (Routley and Ozanne-Smith, 2012),

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<sup>2</sup> Half of workers have experience poor mental health in current job, Mind, 11 September 2018, accessed on 17<sup>th</sup> May 2019 at: <https://www.mind.org.uk/news-campaigns/news/half-of-workers-have-experienced-poor-mental-health-in-current-job/>

Japan (Kawanishi, 2008), China (Chan, 2013), India (Agrawal, 2014) and Taiwan (Chen, 2014).<sup>3</sup>

11. In countries including France and Japan, there are laws in place not only to ensure that work related suicides are recorded, but also to place a responsibility on employers to tackle workplace suicide. In France, hundreds of families of suicide victims have successfully pursued litigation in the courts. In the UK few cases make it to court and when they do, they are rarely successful.
12. The CWU is campaigning for a change to the law so that workplace suicide is recognised in legislation. We consider that if any employee takes his or her own life in the workplace, or indicators exist to suggest it may be work related, it should be immediately investigated as a potential work-related suicide with the burden of proof being imposed on the employer to demonstrate that the suicide was not work-related.

### **The role of employers in suicide prevention and mental health support**

13. We believe employers have a vital role to play in helping to prevent suicide by creating a supportive environment in which workers are not placed under excessive pressure, where they are encouraged to seek help and support when necessary, where they can report mental health problems without fear for their job or employment prospects, and where they can access professional counselling and other support services.
14. The CWU is working hard to develop and improve mental health initiatives in companies where our members work. Responsible employers are generally responding well to this, as they increasingly recognise the benefits of addressing mental ill health, a problem that is now recognised as the leading cause of sickness absence in the UK.

### **Stevenson /Farmer 'Thriving At Work' Report**

15. The CWU believes that the Stevenson/Farmer review of mental health and employers - 'Thriving at work' - needs to be a central focus to NICE guidance.<sup>4</sup> We believe that the link between work and mental health is key to dramatically reducing the proportion of people with a long term mental health condition who leave employment each year and the proportion of those that go on to complete suicide. It is therefore crucial to ensure that all who can benefit from the positive impacts of good work do so. The UK could and should be one of the leading nations in relation to mental health. The UK must prioritise mental health at work, aiming to become a global leader in reducing stigma, improving the mental health of the population, reducing suicides and supporting those who need it. In so doing we can also help to improve the UK's productivity. We very much hope that the Government implements the recommendations, measures the results and

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<sup>3</sup> Waters, S, Karanikolos, M and McKee, M (2016) When work kills, Journal of Public Mental Health, 15 (4).pp 229-234

<sup>4</sup> Thriving at work, The Stevenson/Farmer review of mental health and employers, Lord Dennis Stevenson and Paul Farmer, October 2017, accessible at: <https://www.gov.uk/government/publications/thriving-at-work-a-review-of-mental-health-and-employers>

makes a long-term commitment to improving mental health at work. The NICE prevention strategy must dovetail into that 'holistic' strategy.

### **'Business In The Community' (BITC) 'Seizing the Momentum' Report**

16. Likewise the CWU would point to the Business in the Community (BITC) 'Seizing the Momentum' report which concludes that the prevalence and impact of mental health issues in the workplace is severe, and employers must aim to transform the conversation about mental health in the workplace.<sup>5</sup> They must inspire senior leaders to truly connect with all their employees, and equip line managers with the skills to manage mental health effectively and take an active role in supporting good mental health and wellbeing in the workplace by urgently ramping up the breadth and quality of support they're providing. Unlike physical health, the foundation building blocks for mental health are not yet well established. It is vital these are put in place if real progress is to be made.
17. There is a lack of measurable evidence of what interventions are effective and no consensus yet regarding guidance on reasonable adjustments for mental health at work. Employers are still ill prepared to accommodate or make reasonable adjustments for those with mental health issues as they do for people with physical health. Employers need to work together to urgently increase the speed of action to ensure mental health is truly embedded into organisational culture and all employees are fully supported if mental health cases and suicide numbers are to reduce. Despite progress, too many employees continue to suffer in silence at work, unable to fulfil their potential through a fear of prejudice and exclusion.
18. The BITC report finds that three out of five employees (61%) have experienced mental health issues due to work or where work was a related factor. This has remained consistent throughout the last three years.
19. One in three of the UK workforce have been formally diagnosed with a mental health condition at some point in their lifetime, most commonly depression or general anxiety. Six per cent of employees have been living with a formally diagnosed condition for more than 10 years (including depression, general anxiety, panic attacks and eating disorders).
20. There is still a disconnect between what senior leaders believe about the support provided to employees and the day-to-day reality. CEOs and board members are more likely than those with no managerial responsibility to believe that their organisation supports its staff. 64% of managers have put the interests of their organisation above staff wellbeing at some point and 12% do so every day. 54% of employees feel comfortable talking generally in the workplace about mental health issues. Just 60% of employees feel their line manager is genuinely concerned for their wellbeing.

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<sup>5</sup> Seizing the Momentum, Mental Health at Work Report 2018, Business in the Community, October 2018, accessible at: [https://wellbeing.bitc.org.uk/system/files/research/mental\\_health\\_at\\_work\\_-\\_survey\\_report\\_2018\\_-\\_23oct2018new.pdf](https://wellbeing.bitc.org.uk/system/files/research/mental_health_at_work_-_survey_report_2018_-_23oct2018new.pdf)

21. Lack of high-quality mental health training for line managers continues to be a pivotal issue. Good employee mental health is crucial to running a successful, sustainable organisation. Those companies taking bold, innovative action to foster good mental health at work are reaping the benefits through improved staff recruitment and retention. But more must be done to ensure that these practices and the positive impact they have are adopted across all UK employers.
22. Places of work mirror issues in today's society. Anxiety over financial wellbeing is clearly prevalent, reflecting job insecurity as well as broader concerns about the UK economy. This is having an impact on workplace mental health, and employers must adopt inclusive approaches that work for all. The profile of mental health issues and suicide has never been higher.

### **Where's Your Head At? Campaign**

23. The CWU fully supports the 'Where's Your Head At?' Campaign to call for change to health and safety law so it protects mental health in the workplace, the same way as physical health.

### **Actions**

24. The scale of challenge the nation faces on mental health in the workplace and related suicides cannot be underestimated. Every employer needs to take positive steps to help deliver the change in mental health at work we need. The following actions should be required of all employers:-
  - Ensure employers are aware of the issue of suicide and suicide prevention as a workplace issue and that they have accessed appropriate advice and support as a legal requirement.
  - Employers need to produce, implement and communicate a mental health at work plan in consultation with trade unions;
  - Develop mental health awareness among employees;
  - Encourage open conversations about mental health and the support available when employees are struggling;
  - Provide employees with good working conditions and ensure they have a healthy work life balance and opportunities for development;
  - Promote effective people management through line managers and supervisors;
  - Routinely monitor employee mental health and wellbeing working jointly with trade unions and providing adjustments designed to support and maintain their employment.
  - Ensure provision of tailored in-house mental health first aid and occupational health support and counselling and signposting to clinical help.
  - Ensure, in consultation with trade unions, that mental health conditions are recognised and appropriately acted upon within processes and procedures, including conduct and attendance. This must include records being kept of any actions including justification of any penalty taken against an individual where a mental health condition was a factor.

## **Conclusion**

25. In conclusion, the CWU supports the NICE suicide prevention quality standard but we believe employers should be involved in this initiative. Work has a huge impact on mental health, and evidence suggests that work related suicides have increased due to the growth of job insecurity and work intensification. Employers have a responsibility to contribute to suicide prevention and it is in their interests to do so. We believe it is reasonable to expect that many employers would be open to being part of a multi-agency suicide prevention partnership. The involvement of trade unions is equally important as the representatives of millions of workers across the UK.

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