



IN EQUILIBRIUM STRESS POLICY WHITEPAPER

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In Equilibrium Stress Policy Whitepaper

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In Equilibrium Stress Policy Whitepaper

Definition

A stress policy is a formal written statement explaining what action an employer is taking with regard to stress and mental health problems in the workplace. The aim is to promote mental well-being, prevent stress and mental health problems from occurring if possible, and to state what will be done if employees are having problems.

Notice that the definition talks about action. A stress policy states what you are doing about stress and mental health problems at work. It states what you are doing in order to prevent stress and mental health problems, and also what you are doing to address stress-related problems that become apparent.

Title options to consider for a Stress Policy?

We use the term 'stress policy' throughout this whitepaper, but we include wider issues involving mental health and well-being at work. A stress policy should cover the prevention and reduction of mental health problems, and the promotion of positive mental health and well-being at work. There are sound legal reasons for covering mental health issues. For example, all workplaces are now covered by the Disability Discrimination Act 1995 (see later for coverage of legal issues) Updated Act?. There are a number of Government initiatives related to mental health and well-being e.g. safe and healthy working, family friendly working, work-life balance. In Scotland, there is a specific initiative from the Scottish Executive promoting mental health in the workplace. Please give consideration to whether you should call your policy a 'Stress, Mental Health and Well-being Policy' or something similar. Especially if you are in the public or not-for-profit sectors, this may be a better title *politically*.

Who is this whitepaper for?

This whitepaper may be helpful to you if you are:

- A senior manager or director who needs to find out more about the issues involved in developing a stress policy. You may be the person who will have the authority to 'sign off' the policy once it is complete.
- One of those actively involved in the policy development process. You may have the role of Policy Coordinator or be on a Policy Steering Group.
- An employee or Trade Union representative involved in discussing stress-related issues with management. You may be pushing for the introduction of a stress policy and need information to back up your case.
- Anybody with an interest in preventing and reducing stress at work.

What this whitepaper aims to do

In this whitepaper we try to explain the 'what, who, how, where and when' of stress policy development and implementation. In particular, we aim to explain the process of stress policy development. This is not a trivial task. Some people think you can get a policy 'off the shelf'. We recommend strongly that you take ownership of the policy development and implementation process. No two organisations are the same as they will have different structures, cultures, systems and priorities. So stress policy development is inevitably a DIY job. Although external expert advice and support can be highly valuable, especially with regard to risk assessment and training, at the end of the day it will be your policy, which reflects your organisation. We hope that you will use this whitepaper to help you develop a policy appropriate to your organisation's needs and one which will therefore be effectively implemented.

What is stress?

We are taking as our starting point the UK Health and Safety Executive (HSE) definition from 2010, which regards stress as:

...The adverse reaction people have to excessive pressures or other types of demand placed on them at work

This definition suggests that stress has an objective component; that there is a point for all of us when we will suffer from stress, and that point is reached when pressures or other types of demand become excessive. This clearly indicates that excessive pressure represents a high risk.

Note that pressure itself is not necessarily bad. With the right amount of pressure we can feel challenged, stretched, and this is when we perform at our best. Some people refer to this as 'positive' stress. This may be because we

often use the words 'pressure' and 'stress' interchangeably. However, as the definition above makes clear, we are using the word 'stress' to mean an adverse or negative reaction to too many pressures or demands.

It is true to say that stress also has a subjective element. Our experience of stress may depend upon our perceptions about the situation we are in and whether we believe we can cope. Personality can also play an important role. In the same potentially stressful situation, some people may be resilient or 'hardy'; whilst others may be vulnerable to stress, depression, anxiety or some other stress-related illness. Those with more 'hardy' personalities often perceive their situation in a different way to those who are more vulnerable to stress.

Defining mental health

There is general agreement that mental health is more than an absence of mental illness.

'mental health is the emotional and spiritual resilience which allows us to enjoy life and to survive pain, disappointment and sadness. It is a positive sense of well-being and an underlying belief in our own, and others' dignity and worth'.

The definition of mental health as a 'positive sense of well-being' challenges the idea that mental health is the opposite of mental illness.

Mental health influences how we think and feel about ourselves, about our future and about others as well as how we interpret events. It affects our capacity to learn, to communicate and to form, sustain and end relationships. It also influences our ability to cope with change, transition and life events (Scottish Executive, 2004k).

What sort of risk does stress represent? The answer to the question depends on whether we are thinking about individual employees or their employer.

The risk to employees

We are now beginning to learn more and more about the risk that stress poses to individuals. Indeed, there is a new science, Psycho-Neuro-Immunology (basically Mind-body Medicine), which is largely concerned with just this topic. The evidence is overwhelming that stress represents a risk to mental and physical health, especially where the stressful situation is long-lasting (chronic) or severe.

Mental health risks include:

- Depressive illnesses
- Anxiety disorders, including panic attacks
- Post-traumatic Stress Disorder

Chronic stress also represents a risk to physical health, through damage to the immune system and cardiovascular system functioning, and other negative effects. This can lead to increased susceptibility to viruses, infections, and psychosomatic illnesses e.g. IBS. However, stress can also increase the risk of serious ill health such as Coronary Heart Disease and Hypertension (high blood pressure).

We are dealing then with a very serious health and safety issue that cannot be ignored. It is a real and serious problem that needs to be brought out into the open and faced up to.

The risk to employers

There are four broad aspects to the risk to employers:

- Increased costs to employers
- Bad PR/damage to the employer's image
- The risk of legal action by employees
- Possible future risk of criminal prosecution

Increased costs to employers

There has been an enormous amount of publicity about the costs associated with stress at work. You can open any book about stress and you will find an impressive array of statistics. The kind of costs resulting from stress-related problems include:

- Costs relating to increased sickness absence due to stress-related illness
- Costs associated with staff turnover (e.g. recruitment and training costs)
- Lowered productivity due to reduced levels of staff performance
- Costs incurred as a result of an increased numbers of accidents
- Increased insurance premiums and occupational health costs

We will not go into all the data here, but suffice to say the 'increased costs to employers' argument is pretty persuasive even if it is impossible to separate out all the causal factors.

Bad PR/damage to the employer's image

Clearly, employers do not want to be known for treating their staff poorly and causing stress-related illness. Whether it is through word-of-mouth from employees who leave or go on long-term sickness absence as a result of stress-related problems, or through a high-profile court-case brought by an employee who has suffered from stress-related illness; being known as a stress-causing employer is not good for an organisation's image. The resulting poor image and negative PR can affect the organisation in a range of ways from having difficulty recruiting quality staff to a reduction in their share value due to a withdrawal from investors.

The risk of legal action by employees

A changing legal landscape

One of the key drivers of introducing a stress policy must be the rapidly changing legal landscape. We have seen increasing numbers of 'stress cases'. Most of the high profile cases historically have been stress-related personal injury cases (e.g. Walker, Lancaster, Ingram).

More recently however, the greatest risk to employers has come from disability discrimination cases. Changes relating to the definition of disability will increase this risk still further (see later).

In addition, the HSE launched 'Management Standards' in November 2004. More explicit guidance will increase the likelihood of enforcement and improvement notices, especially with regard to failure to complete suitable and sufficient risk assessments. If your organisation does not have an effective policy in place and does not have a coherent approach to stress risk assessment and stress risk management, it will be vulnerable. Increased risk will inevitably lead to increased liability premiums in the future.

In the next sections, we will summarise the legal issues. Please do not regard the following as legal advice. The content here is to help you think about the policy implications of an ever-changing legal environment.

Stress-related personal injury cases

For an employee to succeed in such a claim they have to show four things. The risk to the organisation will therefore increase when these factors are present:

1. **A breach of the duty of care.** The employee must show that their employer has breached its duty of care to them in some way, that it has not acted reasonably to safeguard the health, safety and welfare of the employee concerned (in this case their mental health and well-being).
2. **A recognised 'injury' or illness.** As it stands, although the HSE have sought to define stress, you would not find 'stress' in the classifications of illness, diseases or disorders we use in this country. Therefore, 'stress' on its own is rarely a sufficient diagnosis to succeed in a personal injury case: a clinical diagnosis would be required given by a relevant expert e.g. a Psychiatrist or Clinical Psychologist. Examples of what is a recognised illness or injury would include one of a number of clinical depressive illnesses or mood disorders, one of a number of anxiety disorders, PTSD (Post-traumatic Stress Disorder), and a number of other mental illnesses.
3. **A causal link between stressors at work and the illness/injury.** For a personal injury case to succeed, evidence must be supplied that shows that the injury or illness was 'work-related', that what happened at work caused or at least contributed to the injury or illness. If there is written evidence e.g. complaints, this increases the risk still further.
4. **Reasonable foreseeability.** This is an important principle with all such cases. The employee (or their legal team) must show that the risk to their health and well-being was 'reasonably foreseeable'. In other

words when the stress-related illness occurred, the employer should have seen it coming. There are two aspects to this foreseeability: vulnerability and causal factors. For example, was it clear and apparent that the employee was showing clear signs of stress? Or was it clear and apparent that stressors (e.g. excessive pressures or demands) were present? If this kind of evidence is present, and it is clear that the employer did not act (e.g. offer appropriate support) the employer can face serious problems defending a stress claim in Court.

The recent **Appeal Court Guidelines**, issued in 2002 as part of the judgement on the Hatton v Sutherland cases, reinforced the above principles, and sought to clarify some of the 'grey areas'. Specifically, the judges made it clear that:

- No job should be thought of as inherently stressful. Employers are entitled to expect that employees will cope with reasonable amounts of pressure.
- Employers should protect employees from risks that are reasonably foreseeable, and can take what employees tell them at face value. That is, without prior knowledge that the employee was suffering from a stress-related condition, they would not be liable.
- (So) Employees have a responsibility to communicate with their managers about stress-related problems.
- Employers who have good support structures in place are much less likely to be found to have breached their duty of care.

Implications of the Barber case

When one of the cases, from the 4 Hatton v Sutherland cases, was appealed to the **House of Lords** in 2004, their Lordships endorsed the guidelines given by the Court of Appeal, though they overturned the judgement on the particular case being heard (Barber v Somerset County Council). The principles that seem to flow from this more recent judgement are as follows:

- The courts can take into account an "autocratic and bullying style of leadership" which is "unsympathetic" to complaints of occupational stress when deciding whether there has been a breach of duty.
- Once an employer knows that an employee is at risk of suffering injury from occupational stress, they are under a duty to do something about it.
- Employees who complain do not need to be forceful in their complaints and need not describe their troubles and symptoms in detail.
- Employers must take certified sickness absence due to stress or depression seriously. They should enquire about the employee's problems and explore what can be done to ease them. Employees should not be brushed off unsympathetically; nor should they be handled by sympathising and simply telling them to prioritise their work without the employer taking **further steps**.
- A management culture that is sympathetic to employees who are suffering from occupational stress and "on their side" in tackling it, may make a real difference to the outcome. Employers must monitor employees who are known to be suffering from occupational stress. If they don't improve, further steps may need to be taken to help them.

Increased risk of disability discrimination cases

It is undoubtedly the case that disability discrimination cases brought under the Disability Discrimination Act 1995 now represent a significant risk to employers, and as such should influence policy development significantly. For example, the policy should show that the employer understands its legal obligations to make reasonable adjustments in situations where stress-related illness could be defined as a disability.

Good sources of advice and guidance in this area are the Equality and Human Rights Commission <http://www.equalityhumanrights.com/> and the Government's own disability site <http://www.direct.gov.uk/en/DisabledPeople/Employmentsupport/index.htm>

Please note that this is a complex area of employment law. Please consult an employment lawyer for advice on specific cases. Content here should not be interpreted as legal advice.

This risk to employers is higher because:

- **The disability need not be work-related.** The need for evidence of a causal link between a breach of duty (e.g. lack of appropriate support to an employee experiencing stress) and the injury or illness sustained that applies in personal injury cases does not apply in the case of disability discrimination. If the condition that the employee is suffering from is defined as a 'disability', it makes no difference what caused the condition. That is, a disability need not be work-related. To avoid potential discrimination in such

circumstances, the employer must 'make reasonable adjustments' (an obligation under section 6 of the Act) or they may be found to be discriminating against the employee on grounds of their disability.

- **The definition of disability is becoming more relaxed.** Until December 2005, a mental health 'disability' had to be clinically well recognised. This is no longer the case. This will mean that, as for a physical disability, what will matter will simply be the effects on the person. Therefore, if the stress results in a 'mental impairment' that has long-term (12 months +) adverse effects, that will be enough to constitute a disability.
- **DDA cases are easier for employees to pursue.** Pursuing personal injury claims through the courts is an expensive business and the chances of success are small. Very few legal firms will take stress cases on a no-win-no-fee basis. Disability discrimination cases, because they are heard in Tribunals are easier and less costly. In addition, there are far more resources and support freely available (e.g. on the internet) that employees can tap into. As more cases succeed, there is greater incentive for Trade Unions to support employees with claims.
- **Successful claims can be very costly.** There is no limit to payouts for disability discrimination. Recent cases have led to big payouts e.g. recently a prison service employee was awarded £300,000. There can be significant indirect costs in terms of bad publicity, increased premiums, time and so on.

Possible future risk of prosecution under Health and Safety law

Under the **Health and Safety at Work etc Act 1974**, employers have a legal duty to ensure, so far as is reasonably practicable, the health of their employees at work. In addition, the **Management of Health and Safety at Work Regulations 1999** oblige employers to risk assess and apply the principles of prevention to protect employee health. Both these pieces of legislation apply to stress-related illness as much as to other types of ill-health. Breaches of health and safety legislation, such as this, may lead to a criminal prosecution in the Criminal Courts, with a penalty of a fine and/or imprisonment. However, to date, no claims have been brought for stress through statutory legislation.

The Health and Safety Executive (HSE) has developed management standards to clarify employers' responsibilities in the area of work-related stress – see below. It is also training inspectors to deal more effectively with work-related stress issues. Until the management standards have become established(?), it may be difficult for inspectors to make judgements about whether employers are fulfilling their duty to prevent employee stress-related illness. However, it is much easier for an inspector to establish whether or not an employer has carried out stress risk assessments. Thus, it seems likely that the first criminal prosecution for stress under statutory legislation may be for failure to conduct stress risk assessments. So far (update?), two enforcement orders have been issued for work-related stress: one in June 2002 to a school in Coventry; and one in July 2003 to an NHS trust in Dorset. In both cases, an improvement notice was given requiring the employer to carry out a risk assessment.

The above is a summary of the major factors. Of course, this is a complex and multifaceted subject. Readers should not regard the above as legal advice, and should consult their lawyers to discuss specific cases.

Health and Safety Executive guidance on the management of work-related stress

Over the past few years, the HSE has been taking an increasingly active role in addressing the problems of work-related stress in the UK. It has a strategy for tackling the issue, which includes providing guidance for employers, developing standards of good management practice on work-related stress and training more inspectors (see above).

The Government has set HSE tough targets for 2008/10 (update!), to reduce the incidence of stress-related conditions, and the associated costs related to sickness absence, poor performance, and incapacity benefits.

HSE guidance document on stress risk assessment

In 2001, the HSE published "Tackling work-related stress: A managers' guide to improving and maintaining employee health and well-being" (HSE Books). These guidelines encourage managers to manage and minimise the health risks associated with stress by taking a stress risk assessment approach. They advise managers to use the same five steps to assess stress risks as are used for other health and safety risks. These five steps are:

1. Identify the hazards
2. Decide who might be harmed and how
3. Evaluate the risks, by:
 - Identifying what action you are already taking
 - Deciding whether it is enough
 - If it is not, deciding what more you need to do
4. Record the significant findings of the assessment
5. Review the assessment at appropriate intervals

HSE Stress Management Standards

Following extensive consultation and piloting, the HSE launched Management Standards on 3rd November 2004. The Standards cover six categories of stress hazards:

- Demands
- Control
- Support
- Relationships
- Role
- Change

Originally, HSE guidance outlined 7 'factors', which included culture. However "culture" is said to "ripple through" the 6 categories above and therefore has not been included as a separate category in the standards. Culture is also more difficult to measure and define. This has probably influenced HSE thinking, as they want to keep guidance for employers on stress risk assessment as simple as possible to improve compliance. The standards are reproduced in full below.

THE MANAGEMENT STANDARDS

DEMANDS

Includes issues like workload, work patterns, and the work environment

The standard is that:

- Employees indicate that they are able to cope with the demands of their jobs; and
- Systems are in place locally to respond to any individual concerns.

What should be happening / states to be achieved:

- The organisation provides employees with adequate and achievable demands in relation to the agreed hours of work;
- People's skills and abilities are matched to the job demands;
- Jobs are designed to be within the capabilities of employees; and
- Employees' concerns about their work environment are addressed.

CONTROL

How much say the person has in the way they do their work

The standard is that:

- Employees indicate that they are able to have a say about the way they do their work; and
- Systems are in place locally to respond to any individual concerns.

What should be happening / states to be achieved:

- Where possible, employees have control over their pace of work;
- Employees are encouraged to use their skills and initiative to do their work;
- Where possible, employees are encouraged to develop new skills to help them undertake new and challenging pieces of work;
- The organisation encourages employees to develop their skills;
- Employees have a say over when breaks can be taken; and
- Employees are consulted over their work patterns.

SUPPORT

Includes the encouragement, sponsorship and resources provided by the organisation, line management and colleagues

The standard is that:

- Employees indicate that they receive adequate information and support from their colleagues and superiors; and
- Systems are in place locally to respond to any individual concerns.

What should be happening / states to be achieved:

- The organisation has policies and procedures to adequately support employees;
- Systems are in place to enable and encourage managers to support their staff;
- Systems are in place to enable and encourage employees to support their colleagues;
- Employees know what support is available and how and when to access it;
- Employees know how to access the required resources to do their job; and
- Employees receive regular and constructive feedback.

RELATIONSHIPS

Includes promoting positive working to avoid conflict and dealing with unacceptable behaviour

The standard is that:

- Employees indicate that they are not subjected to unacceptable behaviours, e.g. bullying at work; and
- Systems are in place locally to respond to any individual concerns.

What should be happening / states to be achieved:

- The organisation promotes positive behaviours at work to avoid conflict and ensure fairness;
- Employees share information relevant to their work;
- The organisation has agreed policies and procedures to prevent or resolve unacceptable behaviour;
- Systems are in place to enable and encourage managers to deal with unacceptable behaviour; and
- Systems are in place to enable and encourage employees to report unacceptable behaviour.

ROLE

Whether people understand their role within the organisation and whether the organisation ensures that the person does not have conflicting roles

The standard is that:

- Employees indicate that they understand their role and responsibilities; and
- Systems are in place locally to respond to any individual concerns.

What should be happening / states to be achieved:

- The organisation ensures that, as far as possible, the different requirements it places upon employees are compatible;
- The organisation provides information to enable employees to understand their role and responsibilities;
- The organisation ensures that, as far as possible, the requirements it places upon employees are clear; and
- Systems are in place to enable employees to raise concerns about any uncertainties or conflicts they have in their role and responsibilities.

CHANGE

How organisational change (large or small) is managed and communicated in the organisation

The standard is that:

- Employees indicate that the organisation engages them frequently when undergoing an organisational change; and
- Systems are in place locally to respond to any individual concerns.

What should be happening / states to be achieved:

- The organisation provides employees with timely information to enable them to understand the reasons for proposed changes;
- The organisation ensures adequate employee consultation on changes and provides opportunities for employees to influence proposals;
- Employees are aware of the probable impact of any changes to their jobs. If necessary, employees are given training to support any changes in their jobs;
- Employees are aware of timetables for changes;
- Employees have access to relevant support during changes.

For more information on the Standards, visit the HSE website: www.hse.gov.uk/stress. It is vitally important that all employers understand the implications of the management standards. We have developed workshops (are the specific ones still available?) to provide training on how organisations can achieve compliance cost-effectively. Please see our website for details www.in-equilibrium.co.uk.

HSE guidance on interventions

In October 2003, the HSE published a guide on interventions to tackle work-related stress, "Real solutions, Real people". The motivation for this arose from the fact that pilot organisations, having carried out their surveys, were asking for guidance on what to do about the stress-related problems they had identified.

This publication aims to give simple guidance on generating solutions to tackle identified stress-related problems. It provides a series of intervention prompt cards, designed to help run discussion groups with staff to generate solutions to issues identified in risk assessments. These contain a range of suggestions and learning points to stimulate discussion. In addition the guide includes three case studies on each of the six management standard areas, outlining how real organisations have tackled stress-related issues.

Policy implications of legal/HSE developments

The recent developments in case law and HSE guidance have significant implications for stress policy development in 10 areas:

1. **Policy must fundamentally be about action.** There is a legal duty to risk assess, and you should also be adopting preventive strategies. This means you must act to prevent and reduce stress, and be both proactive and reactive. Your policy should reflect this. An inspector reading your policy should be clear about what the organisation will do to prevent stress, but also about what will be done if there are employees experiencing stress or mental health problems. Of particular importance is management action. You need to be clear about what you expect managers to do. Inaction is not an option once the risk of stress becomes clear and apparent.
2. **Early referral (e.g. to occupational health or to a specialist where appropriate) should be a priority in cases of stress-related illness.** Long-term stress-related illness represents a significant risk for both

employer and employees. Early referral will reduce the risk of long-term ill-health and absence. Even where an early return to work is not possible, early assessment and diagnosis will help. Where possible, it is better to be clear at an early stage about what the employee is suffering from and how they are affected, so that consideration can be given to the adjustments necessary for successful return and rehabilitation.

3. **The policy should be clear about how stress risks will be assessed.** All employers should now be conducting stress risk assessments. So you must be clear that you will be carrying out risk assessments, how that will be done, and who has responsibility for this. Since launching the Management Standards, the HSE have placed simple stress risk assessment tools on their website www.hse.gov.uk/stress. In Equilibrium can provide expert support with using HSE tools.
4. **Support is a vital component of your policy.** You should be clear about what support is available (internally and externally) and how that support can be accessed. You can't always foresee when employees are going to have problems, but there is no excuse for inaction once it becomes apparent that an employee is experiencing stress / mental health problems or is at risk of stress. It will also help to minimise legal risk if your employees can self-refer for confidential counselling or similar. Access to internal support, including practical support like training, should also be covered in the policy. Support should include a commitment to make reasonable adjustments in cases of stress-related disability
5. **The policy should clearly state that you understand your (individual) legal obligations** e.g. that you have a duty of care, that you understand that you must make reasonable adjustments in cases where stress results in 'disability'. Beware of just copying the model policy on the HSE website. Remember that the main emphasis of the HSE approach is on organisational approaches and on risk assessment. However the policy, if it is to minimise legal risk, should also cover individual aspects. The HSE model policy is inadequate in this regard. You should give consideration to whether you need to include reference to mental health, and not just allude to stress, if you want your policy to help protect the organisation from individual cases e.g. claims of disability discrimination.
6. **Your policy should demonstrate that you understand what is needed to meet the HSE Management Standards.** There are specific and general implications for policy. For each of the standards, check that your policy, once implemented, moves the organisation towards compliance and the 'states to be achieved'. The emphasis from the HSE is on constant improvement, so the policy should be moving the organisation in a positive direction. A general implication is that your policy must demonstrate that you have systems in place to respond to individual concerns e.g. a consistent risk management process will be followed. A good way to demonstrate this is by showing that, as part of the implementation of the policy, you are training all managers in stress risk management processes.
7. **Make sure that, if stress or stress-related illness is caused by bullying or harassment, employees know what support is available and how to get that support.** Action to tackle bullying and harassment is a key aspect of the management standard 'relationships'. So within your policy you should state what managers/employees should do and what support is available if stress is caused in this way. You should already have a policy related to bullying, harassment, or dignity at work. If you have not, you need to develop one straight away, as otherwise you could be vulnerable legally. If you have a suitable policy, you should refer to this in your stress policy.
8. **Communication issues should have strong emphasis in the policy.** An emphasis on good communication will help in a number of ways. Good communication will raise awareness of stress and the risk it poses, and communication plays an important role in meeting most, if not all of the management standards. For example: control – consultation on work patterns; support – employees receive regular and constructive feedback; change – adequate employee consultation etc. Therefore, communication and communication channels are vital for policy development and implementation.
9. **Training will be required for successful implementation.** Successful implementation and meeting of legal obligations will require investment in training and development activities. In particular, management training will be required as managers will have the main role in implementing organisational policy on stress management. Training required for implementation and support purposes should be covered in the policy. For details of In Equilibrium training services please go to our website www.in-equilibrium.co.uk.
10. One way of thinking about your stress policy is that the commitments and actions contained within the document **demonstrate** to anyone who reads it **that you take your duty of care seriously** and will act when and where necessary to support those experiencing and/or at risk of stress.

Why introduce a policy on stress?

There are three main reasons why an organisation introduces a stress policy:

- Political reasons
- Legal reasons
- Business reasons
- Ethical and moral reasons

Political Reasons

A stress policy is becoming a political necessity for many organisations, particularly those in the public sector. There are a number of reasons for this. For example:

- The organisation has to be seen to be taking the issue of stress seriously as a health and safety issue.
- There may be strong pressure from powerful Trade Unions to do something about preventing and reducing work-related stress.
- A number of initiatives from Government Departments and from Europe may be driving the organisation to address stress-related and mental health issues.
- There are rising expectations from a number of politically powerful groups e.g. service users, tax payers.

Legal reasons

Although some of the legal issues have already been explained, these reasons are so important that they are worth restating. It is now abundantly clear that having a well-thought out and implemented stress policy will reduce the risk of legal action by employees and provide a strong legal safeguard. This is because the policy evidences clearly what the organisation is doing to prevent and reduce stress and mental health problems at work.

For example, the policy details management action required in the event of an employee becoming stressed, and explains the support structures that come into play. This makes it far less likely that reasonably foreseeable risks will be missed, and demonstrates that the organisation takes its duty of care seriously.

Business Reasons

There are several convincing business arguments for the development of a stress policy:

- Stressed employees make more mistakes (including safety errors) and perform more(?) poorly when compared to contented, motivated employees. We have direct evidence of this from our stress audit work, where we compare different groups within an organisation. The difference in performance between stressed-out and contented groups is stark.
- Stress-related problems, when they are not addressed at an early stage, become expensive disasters, involving long-term absence and loss of good employees. The stress policy reduces the risk of this happening and that can save the organisation substantial unnecessary costs .
- Stress within the organisation causes major PR problems both internally and externally. For example, employees become highly dissatisfied. This affects their relationships with each other, with clients or customers, and with suppliers. So stress is not just an individual problem. It can have seriously negative ramifications for the long-term financial health of the business. A good stress policy generates the opposite: good PR internally through having less stressed, cared-for, supported employees; and good PR externally through better relationships.

Ethical and moral reasons

There are, of course, strong ethical and moral reasons for implementing a policy to prevent stress and enhance well-being. It isn't simply a business decision. Many organisations now have a well-thought out stance on corporate social responsibility, for example. They want to be seen as caring: caring for their employees, caring for their environment; and caring for their communities. A stress policy can demonstrate that the employer cares, and that actions will be taken to demonstrate that care.

Selfish, mercenary organisations are rarely successful in the long-term. A commitment to the mental health and well-being of employees is now seen by many organisations (across all sectors) as an investment.

A stress policy can act as:

- **A cornerstone** – the policy provides a baseline, a foundation, something to build from.
- **A leader and guide** – the policy leads and guides the organisation, its managers and employees down the right paths – those that lead to reduced risk of stress.
- **A philosophy** – the policy can say ‘this is what we’re about, who we are, what we stand for (provide a moral and ethical stance)’
- **A protector** – the policy can act as a protector of individuals, managers, and the organisation. It helps the organisation meet its legal responsibilities with regard to doing what is reasonably practicable to safeguard employees’ mental health.
- **An agent of culture change** – the policy can promote and encourage changes that prevent and reduce stress, promoting a better culture and climate.
- **A consistency builder** – the policy can build consistency of approach, message, practice, and philosophy. This is essential as it ensures that all staff are treated equally.

How to develop and implement your policy

There are five major stages of stress policy development:

1. Preparation
2. Benchmarking: Where are you now? Writing the policy and development of structures
3. Implementation
4. Evaluation and Review

1. Preparation

There are four areas you need to concentrate on at this stage:

- **Cultural issues**
- **Gaining commitment**
- **Appointing a Policy Coordinator**
- **Consultation**

Cultural issues

Culture is about 'what normally happens around here'. One of your aims will no doubt be to influence organisational culture in a positive way, to influence 'what normally happens' in such a way as to minimise risk associated with stress at work. So during your preparation stage it's worth asking yourself and other stakeholders certain 'big picture' questions about the kind of culture you want and about the overall purpose of the policy.

Gaining commitment

If your policy is going to work, be effective, and influence your organisation's culture and climate, you need to have people at the top of the organisation who are committed to the process. It may be difficult to win over all senior managers, and perhaps that is a pipe dream. However, without some senior managers on your side it's going to be an uphill struggle. So our advice is to devote time and effort to gaining the commitment and resources required. This is an ongoing marketing task, involving research and sales activities. You have to prepare your case and persuade. You have to sell the business benefits of preventing and reducing stress. 'In Equilibrium may be able to help in this regard by making a presentation to your Board on the business case for tackling stress at work. Call us if this is of interest 0800 622 6932.

It is not difficult to find evidence to support your case. You can make the point that employers have a duty of care, and that duty extends to mental health and well-being. You can point out that the employer has to assess risk, and that stress has (according to the HSE) to be treated just the same as any other health hazard. You can point out that the HSE brought out guidelines in 2004 for managers in tackling work-related stress. You could say as well that the HSE are likely to (?) bring in regulation with regard to stress and that, if the organisation does not have a policy, it may fall foul of that regulation.

You can analyse cost-related data from your own organisation, for example with regard to absence, staff turnover and retention. You could use evidence publicised in the media, for example legal cases involving stress-related personal injury. You could highlight the cost of single cases within your own organisation. Single, real cases are vivid and powerful from a psychological point of view. You could, for example, take a single long-term stress-related absence, and work out the total cost to the organisation of sick pay, cover, disruption, training, productivity, recruitment and so on. You can also find much relevant information on the web. We think that Google is definitely the best search engine to use for this (?).

Appointing a Policy Coordinator and Policy Steering group

At this preparation stage you should also be thinking about appointing a Policy Coordinator and, if appropriate, a Policy Steering Group. There can be a lot of work, so appointing a good team to carry out the work is essential. Your Coordinator should be someone who is senior enough to have some clout but also someone who is trusted and has credibility within the workforce as a whole. Independence may be important. S/he should ideally be someone who has some knowledge about the issues involved.

If there is one quality that is necessary above all it would be emotional intelligence. By that we mean that the Coordinator needs to be a good listener, patient, diplomatic, persuasive, determined, and a good leader. Don't choose someone who'll put people's backs up.

Your Policy Steering Group should be representative of the organisation. That is, there should be both management and employee representatives, and its members should reflect the diversity of the workforce.

Policy Objectives

It is a very good idea to start thinking at an early stage about what you want the implementation of your stress policy to achieve. These are your policy objectives. Do you simply want to raise awareness of stress, or do you want to do something more meaningful in terms of risk assessment and management, training and development, reduced costs and improved performance.

Being clear about your 'objectives', or the more positive 'benefits from following this policy' is very helpful to the whole development process. It clarifies the actions you need to build into the policy to make this happen. For example, an objective 'to improve the consistency of management approach', will require the development of a training programme for managers. 'Improved and better-utilised support services' may require a new employee assistance programme and awareness raising activities with staff.

Objectives are also vital in terms of evaluation. Clear objectives enable you to think about and plan for measurement to establish a benchmark (now) and (later) whether the objective has been met. For example, 'overall reduction in key stress indicators' will cause you to think about how you measure (stress-related) absence at present and what systems might need to be introduced to monitor this in the future.

In summary, think about objectives before you write your policy and for each objective you decide on, think about:

- How will we achieve that?
- How will we measure that?

Consultation

You should at this early stage be beginning the process of consultation. Once the Coordinator and Steering Group have been appointed this will be one of their first tasks. They will need to begin the process of communicating with managers, employees, their representatives, and with other stakeholders about introducing a stress policy and what that will involve.

Preparation stage checklist

- What sort of organisational culture do you want?
- How will the organisation approach the issue of stress at work?
- What will be its philosophy?
- What do you hope to achieve through the introduction of the policy (purpose and objectives)?
- Is there commitment from senior management to the introduction of stress policy?
- Have the benefits of developing a stress policy been sold to the senior management team?
- Has someone with sufficient seniority agreed to 'sign off' the policy once it is ready to be implemented?
- Who is going to do the work involved in the policy development process, and who is going to lead that process?
- Have you begun the process of consulting with all employees about the introduction of a stress policy?

2. Benchmarking: where are you now?

This stage is fundamentally about finding out where you are now regarding stress. It is vitally important that you do this. It will be very difficult to meaningfully evaluate the policy later unless you have assessed and recorded where you are now.

Stress risk assessment

The first and most important task is stress risk assessment. Risk assessment is a statutory obligation under the Management of Health and Safety at Work Regulations 1999. So you should be doing this whether or not you develop a stress policy. However, in policy development it is also extremely helpful to take a snapshot of organisational mental health and well-being as part of your benchmarking process. A stress risk assessment will identify 'hot-spots' where employees are experiencing stress and will point you in the direction of why. That is, it will help you identify stressors (hazards in risk assessment terms).

Helpful, cost-effective technology

Recently developed technology has made the task of stress risk assessment much easier and has dramatically reduced the cost. The best technology we have found is that developed by a company called health-e-solutions (do we want to name them? We work with a company who has developed sophisticated technology in this regard?). Their product called 'stress meter' is based upon HSE's Stress Indicator (35 questions) so enabling external benchmarking. But it also enables the development and addition of sector-specific questions for internal benchmarking. The process is secure, confidential, anonymous and fully automated. It is an online system (although paper and pencil can still be used). The system enables full benchmarking against the Management Standards, and enables deeper level analysis by filter questions e.g. by department, location, age, length of service or whatever comparisons are meaningful for the organisation. Anonymity and confidentiality is protected as the system doesn't allow analysis that results in group sizes of less than 10. The system produces full stress risk assessment reports automatically and produces action plan templates for each management standard category. This saves a lot of time and money.

Such technology has made an enormous difference to employers and to consultants. It means that most resources can now be targeted at tackling stress problems identified and minimising stress risk, rather than being spent on expensive long-winded stress audits.

The system can also be used to do the analysis for risk assessments using Work Positive, a stress risk assessment tool developed in Scotland.

Stress risk assessment is more than just doing a survey, for example you should take into account data from other sources. However, the assessment will not be valid unless you gather the views of employees. Thankfully, such technological advances have made this a much less onerous task.

To get more information about stress risk assessment, please go to our website where you can find more information and download a useful guidance booklet <http://www.in-equilibrium.co.uk/consultancy/stress-risk-assessment>

Apart from the statutory aspect of stress risk assessment, there are some general areas you should consider for the purpose of establishing 'where you are now':

1. What is being done about stress at present
2. Your existing support structures
3. Your existing policies
4. Training for managers and employees
5. Management of stress-related absence
6. Management information systems
7. Communication and consultation

1. What is being done at present in order to tackle stress at work?

In particular, what are managers doing? It may be that they aren't doing very much, or they may be doing quite a bit. Either way, you need to build up a clear picture of what is actually happening. You may well find that what is happening in one part of the organisation is very different to what is happening elsewhere. This frequently is the case in large, complex organisations, where different departments can have totally different approaches.

2. Related to the above, what support structures exist at present, how aware are managers and employees of them, and to what extent are they used?

It is essential to audit existing provision of support to employees e.g. counselling, occupational health. For example, you may find that there are some good support structures in place, but most employees appear ignorant of their existence and don't use them. Or it may be that they choose not to use them, which is frequently the case with help-lines, for example. Either way, knowing where you are with regard to support

structures will stand you in good stead. You will make a more informed decision about what works, what doesn't, and what's needed.

3. What policies do you have, and how do they relate to the issue of stress at work?

It's a good idea to do an audit of existing policies, and to start thinking about how they will relate to the stress policy. When you come to write your policy it will be much better if you are clear about how it will relate to other policies. You may want to refer to them explicitly within the policy document, where they have a role in stress prevention or reduction. In a very important sense, your policies are an example of a support structure because managers, if they are aware of the flexibility they have when dealing with stressed employees, will be able to generate better options. Having options lowers stress levels, because they contribute to higher perceived control in employees. Relevant policies would include those relating to: health and safety, bullying and harassment or dignity at work, equality and diversity, attendance or absence management, flexible working, work-life balance and so on.

4. What training, if any, do managers and employees get at present?

Again, you need to carefully audit this. It may be, for example, that there has historically within your organisation been some stress awareness training made available, but that only a small percentage of employees have attended. It is quite likely that managers will have received no specific training with regard to stress. The important thing is that you build up a good picture of what has been going on, and where.

5. How is stress-related absence being managed at present?

You may want to target stress-related absence as part of your policy, so you should definitely audit the ways stress-related absence is being dealt with at present. Notice the use of the word 'ways'. You will probably find a number of very different management approaches being applied in practice, even if you have an absence management or attendance policy already in place. It's very helpful to know what's going on in this area, because you can assess where you are against where you want to go. This will also help with regard to training needs, particularly for managers. You will want managers to act consistently with regard to stress-related absence.

6. What do you have in the way of management information systems, and how well do they work?

These are important questions to address at the benchmarking stage, because if you are going to have a successful policy, the quality and accessibility of management information systems will be critical. So, with regard to stress issues, you need to look at what there is, what information is available, who accesses that information, and how easily. You may find that your present systems are inadequate for the purposes of the policy. For example, can managers get information and statistics related to absence when they need it? Ask managers about what they think about the existing systems and what they think they will need.

7. How well does the organisation communicate and consult at present?

It is important to do something(?) about benchmarking this area as it is so important in preventing stress at work.
What communication channels are used at present?
How effective are they?
How effective is vertical communication?
Do managers hold regular briefings and/or team meetings?
Do employees have communication channels that enable upward communication?
Are managers and employees able to give each other regular feedback?
How well is change explained and communicated at present?

Additional considerations

It may also help check to out what other, similar organisations are doing. There is nothing wrong in trying to emulate best practice elsewhere. It's very important also to monitor developments in terms of the changing legal context. Check out the HSE website regularly to see their latest press releases and advice on stress.

The better the picture you have of 'where you are now', the easier it will be to monitor progress and evaluate the success of your stress policy.

Consultation

If there is a watchword here, it's consultation. You need to consult as widely as possible during the benchmarking stage. Consultation is not only good practice. It is a legal obligation to consult about anything that impacts on health and safety at work. In addition, your policy will likely bring in new structures and new ways of doing things, which may impact on people's work, so effective consultation is essential.

The better you consult, the better the final policy will be. Good consultation will also build commitment to the policy when you come to implement it. If people feel involved in the process, they feel part of it, and will be committed to it. No involvement – no commitment!

Benchmarking stage checklist

- Have you completed a stress risk assessment?
- What is being done at present in order to tackle stress at work? In particular, what are managers doing?
- Related to the above, what support structures exist at present, how aware are managers and employees of them, and to what extent are they used?
- What policies do you have, and how do they relate to the issue of stress at work?
- What training, if any, do managers and employees get at present?
- How is stress-related absence being managed at present?
- What management information systems do you have, and will they be adequate once you bring in the stress policy?
- How good is communication?
- Have you consulted widely?

3. Writing the policy and development of structures

Once you have completed the benchmarking stage successfully, you will be in a strong position to develop a good policy.

There are two major tasks at the development stage:

- **Developing systems and structures**
- **Writing the policy document**

In this section, we have also included a Model Stress Policy to give you some ideas.

Developing Systems and Structures

You may need to develop:

- Training courses for managers and employees
- Support structures
- Management information systems
- Ongoing Risk Management Systems
- New procedures for managing stress-related absence

Training courses for managers and employees

Training is, of course, a vital part of the implementation stage (see later). You need to think now about the kind of training courses that you'll need, so that training needs can be met as soon as you have completed writing the policy.

You will almost certainly need to train all managers (as managers will be the people who implement your policy) and may want to make stress/lifestyle management training available to all employees, both in terms of raising awareness and developing skills. If your policy promotes positive mental health, your training interventions should reinforce and support the messages in the policy e.g. raising awareness of mental health and providing input on how to achieve a good work-life balance. You can find out more about the approaches we recommend and about in-house training on our web-site www.in-equilibrium.co.uk.

Support structures

You will have benchmarked your existing support structures at the previous stage, and now have a better idea of what you would like to introduce. So at this development stage, you need to either enhance old structures, develop new structures, or source external support services. Support covers both external and internal structures.

You should offer some form of counselling service or help-line as an absolute minimum. Support structures of this kind are often called 'employee assistance programmes' or EAPs. EAPs come in many shapes and sizes, and quality is variable.

Counselling support can and does help individuals experiencing stress but there is little evidence that this kind of support addresses the underlying causes of stress in an organisation. In addition, most employees will not use counselling services or help-lines even though they are stressed. So, if you do intend to offer counselling, remember that you still need to address the issue of support inside the organisation. Providing workshops addressing work-life balance issues and setting up mutual support groups are good examples of internal supports.

We would definitely recommend including some kind of occupational health provision for employees experiencing stress or mental health problems. The main priority here is to have a system so that employees with problems get early referrals and/or clinical assessment. Early referral will minimise the risk of long-term absence. Occupational health can also help with rehabilitation following absence. This need not be expensive. In most parts of the country, you can find good occupational health providers who will work flexibly with you, and supply your organisation with a service on an as-needed basis if that is appropriate. Please contact In Equilibrium if you would like help in sourcing a good occupational health provider(?).

You need to think about support for managers as well as for all employees. Managers can be trained to be more skilled in dealing with stress (see above) but will still need to access support in difficult cases, so think now about what sort of support they will need from HR/Personnel, Occupational Health, and Health and Safety Specialists. In particular, you should think now about the quality of communication channels and level of managers' awareness of support available to them.

You should also think carefully about your internal support structures. Sometimes organisations make the mistake of abdicating responsibility for the care of their employees and go exclusively down the 'external' support route. You should think about employees' access to training (see above), to internal coaching and mentoring, to health advice, to HR, and to employee or union reps. You also need to think about how you want managers to support employees, and don't forget informal support. Think now about how you can encourage people to support each other.

Management information systems

Your benchmarking of these systems will have given you an idea of how they need to be improved. You may indeed decide that you need a new system. The important thing is to think about what you want managers to do and work backwards. Let the managers' needs be the guide. It doesn't necessarily need to be hi-tech. The important thing is that it works and that managers understand how to access the information that they need.

You will need systems that generate practical, useful information about stress indicators. See the section on evaluation for a list of potential indicators. If you are going to use the presence of stress indicators to 'trigger' a risk assessment process, you'll need management information systems that provide these statistics in the right way, at the right time. It's no good having a system that shows up the presence of stressors three months after the event!

Ongoing risk assessment and management systems

You will probably have some generic risk assessment procedures in place already, but it is very likely that you will need to develop specific procedures and protocols to assess stress risk, particularly the risk to employees' mental health and well-being.

We have already discussed the role of organisational stress risk assessment (stress audit). A stress audit generally assesses risk in a more global, organisational or group sense. That can be useful but has some limitations. For example, a stress audit is essentially a snapshot of organisational mental health at a moment in time. The problem is that stressors can appear at any time, and so the situation can change rapidly in terms of stress risk. The obvious example is in terms of reorganisation or restructuring.

In addition, stress is an individually experienced phenomenon, and the risk can and often does become apparent at the level of the individual. Remember that your policy says what you are doing to prevent stress, but also what will be done when employees are having problems. Also, the legal risk has to be mainly considered in terms of how the organisation has dealt with individuals having stress-related problems. For this reason, you also need to adopt an individual risk assessment and management approach. For policy to be effective, managers must be trained to assess and manage risks on an ongoing basis.

New procedures for managing stress-related absence

You will have benchmarked your existing absence management or attendance policy as part of the audit stage. Here, you need to think about whether you need, or want, specific procedures for managing stress-related absence. There are some very pertinent facts here that are worth stating:

- With stress-related illness, the earlier the intervention the better the outcome. This is true in a health sense, a business sense, and a legal sense.
- Stress-related absence is obviously a key stress indicator, so you need procedures that highlight this and enable early action.
- If the stress-related absence progresses for longer than about 3 weeks, the risk rises dramatically that the employee will never return. Many policies deal quite well with short-term absence, but fail totally when it comes to long-term absence. For example, some policies only advocate referral to Occupational Health after 2-3 months absence. Particularly with stress-related conditions, this is too late!

If you do bring in specific procedures you will clearly need to upgrade your existing policies, and give thought to the training implications. For example, you will need to plan briefings for all who will be affected by this decision and include input on the new procedures in training for managers. You will also need to think about the consultation implications.

Writing the policy document

What should be included?

It would be wrong to be too prescriptive about what you should put into your policy. However, the policy should cover two general areas:

- **Information** - about why, what, who, and where.

- **Actions** - about how and when. This is probably the most important aspect of the policy and yet, in our experience, often the weakest area of most policies. Policies should be specific about actions.

Information

Information could include:

- **Who has sanctioned the implementation of the policy.** A senior manager or the corporate management team would normally be attributed with 'signing off' the policy.
- **Who is covered by the policy.** The policy would normally cover all employees, but there are circumstances where it might also cover non-employees such as contractors, students on work placements etc.
- **Policy statement and commitment.** A critically important element. The policy statement should be unambiguous and brief. You should clearly state what the policy commits the organisation to do.
- **What stress is and what its implications are.** Be absolutely clear about what you mean by stress; for example, an explanation that stress is:
 - A natural reaction to excessive pressures or demands
 - Not a personal weakness
 - No such thing as positive stress, stress is bad
 - Not the same as pressure
 - Can lead to mental *and* physical ill-health
- **The statutory framework.** You should clearly state your legal obligations with regard to your duty of care and risk assessment where stress is concerned.
- **The causes and effects of stress.** There are many potential sources of such information. Briefly state typical causes and effects. This could be included as an appendix.
- **Support structures.** Give details of the support structures within the organisation e.g. Employee Assistance Programme, Occupational Health Advisers. This could be included as an appendix.
- **Roles.** Explain the roles of key staff with regard to your policy e.g. HR, Occupational Health. This could be included as an appendix.
- **Training for managers and staff.** Give details of training for individual employees and managers. Training for managers is essential for successful implementation. It is managers who implement policy on the ground. Again, details could be included as appendices.

Actions. Actions must be included. The policy is, after all, partly a guide stating how you want people to behave in particular circumstances, especially managers. Actions could include:

- **How awareness will be raised.** Raising awareness about stress is a job in itself, but you also need to raise awareness of the policy. You could include information on how you intend to do this in your policy document.
- **What managers should do to prevent and reduce stress.** You should state how managers should deal with stress-related situations. Be clear about what you expect managers to do and their role in assessing and managing the risk of stress. Key here will be training. You could explain briefly how managers will be trained in order to achieve consistency of management behaviour.
- **How stress-related absence should be managed.** Linked to the above, it will be important to explain how managers should deal with stress-related absence. This also provides clarity and reassurance to all employees. This is not an 'Absence Management' or 'Attendance' Policy so the emphasis here should be on provision of support, not necessarily on 'reducing' absence (even though you would probably like to see such reductions). That is, reductions in absence would be an outcome of reduced stress levels and better, more consistent management support.
- **How risk will be assessed and acted upon.** You should explain how and when you intend to carry out risk assessments (see earlier sections on risk assessment and management)

- **How managers and staff can access support.** This is vitally important. You should explain clearly how support can be accessed. Both managers and individual employees will need support. For example, you should explain what help is available to managers if they are dealing with a difficult case (help from HR/Occupational Health). You should explain also how employees can access support for themselves, and how managers can refer staff if that is appropriate.
- **When and how the policy will be evaluated and reviewed.** This is the part of a policy that is most often either overlooked or not followed through. You must clarify how you will do this and who will be responsible for it; otherwise all your good work will be undone.

Additional summaries for managers and staff

You can probably see already that your stress policy document is not likely to be a very short document. There is something to be said for brevity, but this policy must cover quite a few bases, so it would be a mistake to miss out important information or actions. The answer is to consider summary sheets. You can make up summaries for both managers and staff, although there is an argument that managers should be aware of the whole policy. Certainly, it is a good idea to produce a one pager for staff that summarises in very clear language what the policy is about, what stress is and is not, and some clear do's and don'ts.

Before you finalise the policy, run it past people

Hopefully your consultation will have yielded some good ideas from the workforce. Again, this is a process. Once you have written a draft, run it by some key stakeholders to see what they think. Like anything of this importance, you need to test it, consult, and take some time to get it right. It may be very valuable to involve an outside consultant at this stage to look over the policy. The consultant may pick up on certain omissions, saving painful and time-consuming revisions later on. It is much more cost-effective to test now, than have to completely re-write it later.

It's Your Stress Policy Document

As previously stated, you will have to tailor your policy to your needs and priorities. However, our model policy should give you some ideas (see below). Remember that you will have to bear in mind your existing policies, and that the stress policy will have to fit in to your overall policy framework.

Don't promise what you can't deliver

By the time you reach the stage of writing the policy document, you will probably be very aware of your organisations limitations, i.e. what you can realistically do. This is an important realisation because it is a mistake to promise what you can't deliver. Indeed, this is where having a written policy can potentially backfire. If an employer is involved in litigation and an employee can show that the employer did not follow their own policy, this may be viewed more negatively by a Judge than if the employer did not have a policy at all. So as you look through the model policy, bear in mind that you may not need to include everything we have. Rather, use the model policy as a guide to what you *could* include. Bear in mind you must demonstrate your duty of care, you must conduct risk assessments, and you must make reasonable adjustments in cases of disability. Also, it would be wise to show that you are acting to comply with the HSE Management Standards. It may help to pay close attention to the section headings and think about what you need to include under these headings:

- Introduction
- Definitions of stress and mental health
- Legal obligations
- Policy statement and commitment
- Benefits from following the policy
- Risk assessment and management
- The role of managers
- Management of stress-related absence
- Support for managers
- Employees' responsibilities
- Support for employees
- Working relationships
- Evaluation and review
- Appendices

Model Stress Policy

Please do not just copy this whole document and use this as your stress policy. Policy development is a process. It would be highly inappropriate to use a policy document 'off the shelf'. Rather, use this model policy as a resource that you can dip into and adapt for your organisation. We have no problem with you using the words we have used or copying passages **if they fit well with what you are trying to achieve**. It's your policy so it should be unique to you. We have included our comments in italics. Our comments are not meant to be part of any policy.

'ABC Company' Model Stress Policy

Introduction

ABC's Stress Policy has been developed by the Stress Policy Steering Group in full consultation with management and employee representatives, and has been endorsed by the Corporate Management Team (include date). The policy comes into force on xx/xx/xx and covers all employees, contractors and students on work placement. Failure to comply with this policy may lead to disciplinary action being taken.

Definition of Stress

Stress is defined by the HSE as **'an adverse reaction people have to excessive pressure or other types of demands placed on them'**. (update?)

We wish to make it clear that 'stress' is not the same as 'pressure'. Pressure can be motivating and challenging, and improve performance. By 'stress' we mean the negative response to too much pressure or too many demands, which the person finds difficulty in coping with. Stress, particularly if it is prolonged, represents a risk to both mental and physical health. Stress can be caused by pressures at home or at work or a combination of home and work pressures.

Definition of Mental Health

Mental health is **'the emotional and spiritual resilience which allows us to enjoy life and to survive pain, disappointment and sadness. It is a positive sense of well-being and an underlying belief in our own, and others' dignity and worth'**.

This definition challenges the idea that mental health is the opposite of mental illness. Here, mental health is a 'positive sense of well-being'

Legal Obligations

We acknowledge that we have a duty of care to the mental health and well-being of our employees. We will treat stress in the same way as any other health hazard and assess risks to mental health and well-being when necessary. Where an employee becomes disabled through stress-related illness, we will make reasonable adjustments where practicable. We acknowledge that we should act reasonably to prevent risks that are reasonably foreseeable. Any recording of information will conform with the latest data protection regulations (see the Data Protection Policy).

Policy Statement and Commitment

ABC recognises that stress, especially chronic stress, can be a considerable risk to both physical and mental health. This policy explains the action we are taking as an employer with regard to stress-related problems (including mental health problems) in the workplace. The aim is to prevent stress and mental health problems from occurring, if possible, but also to state what will be done if there are employees experiencing stress-related problems.

ABC is committed to promoting a healthy environment and supportive climate, and a culture of openness, where stress is not seen as a personal weakness, and where employees experiencing stress or mental health problems can access appropriate support. ABC is committed to supporting employees in achieving a healthy work-life balance.

ABC is committed to a recruitment policy that does not bar people from employment at ABC because they have experienced mental health problems.

Benefits from following this policy

We anticipate the following benefits from implementing the Stress Policy:

- Improved working climate and culture
- Greater openness about sources of pressure at work at all levels
- Better awareness about stress and mental health in all employees
- Better work-life balance for all employees
- Greater consistency of approach from managers in dealing with stress
- Earlier identification of stress-related problems

- Improved stress risk management skills in managers
- Overall reduction in key stress indicators
- Improved and better-utilised support services

Risk Assessment and Management

An organisational stress risk assessment (stress audit) was carried out in advance of the development of this policy and has influenced its content. All managers, employees and their representatives were fully consulted and the results have been fed back. As a result of the stress risk assessment, stress problems were identified and action plans have been developed to tackle them and minimise risk. Over the 12-month implementation phase stress indicators (e.g. stress-related absence, staff turnover) will be monitored by HR and further risk assessments will be carried out, as necessary, by specially trained staff. Independent expertise may be brought in to help with risk assessment where appropriate. Managers will have an important role in the management of stress risks and will be supported by HR / Occupational Health as appropriate. Managers will be trained for this role (see below).

The role of managers

Managers have a critical role in minimising and managing stress risks, and will receive relevant training to give them the skills and knowledge to be able to implement the policy. All managers will be required to attend this training. The training courses will cover prevention of stress and mental health problems at work, monitoring of stress at work, and development of action plans to tackle work-related stress problems.

Managers have a critical role in offering support to employees, and in facilitating support from elsewhere as necessary. Managers are not expected to take on the role of Counsellors. However, managers will be expected to use good communication skills in their tackling of stress-related issues. Managers are expected to be consistent in their approach to stress-related absence, and to refer employees to relevant support services when necessary. Managers should be flexible where appropriate, especially where reasonable adjustments are required for staff with mental health problems or where phased returns to work are necessary following stress-related absence.

Reasonable adjustments would depend on the circumstances but may include:

- Temporary reduction in working hours
- Temporary adjustment in working duties e.g. temporary removal from customer-facing role, reduced workload
- Additional training or support
- More flexible working arrangements to allow attendance at appointments
- Access to a quiet space to allow undisturbed work for a period of time
- More regular supervision

Managers should be aware of employees' training and development needs, especially when an employee is taking on a new or changed role.

Managers are encouraged to maintain good communication at all times, and this should be 'face-to-face' communication whenever possible. Good communication reduces unnecessary uncertainty and prevents stress, especially during organisational change. Positive feedback is encouraged and any criticism should be constructive. Managers should seek to consult and involve staff at the earliest appropriate stage in decisions that affect them.

Managers should monitor and review the workload and working time of staff to ensure that neither becomes excessive.

Managers should manage poor performance and attendance effectively in order to prevent unnecessary pressures on colleagues in teams.

Managers should not regard stress as a weakness, and should encourage open discussion of work pressures at team meetings.

Managers should adopt an 'open-door' policy. This enables managers to be more approachable and will assist them in identifying stress-related problems at an early stage, allowing early intervention.

Managers should be clear about the role, responsibilities and expectations of staff.

Managers should not hesitate to seek support from HR and/or Occupational Health if in any doubt about what to do about a stress-related issue. Managers should never ignore such issues if they have a concern related to stress or the mental well-being of staff.

Management of stress-related absence

Managers should be consistent and follow the agreed absence management procedure as clearly laid out in ABC's Absence Management Policy. In particular, managers should be aware that increased or more frequent absence may indicate underlying stress problems. Managers should use the opportunity of return-to-work interviews to discuss stress-related problems when appropriate. Where an absence is stress-related, an early referral to

Occupational Health is essential. Managers should seek advice from Human Resources or Occupational Health if in any doubt.

Support for Managers

All managers will receive appropriate training in order to implement this policy. Its main aim will be to assist managers in identifying stress-related problems and to minimise associated risks. Details of the training can be found on all communication channels.

Managers will receive briefings on the roles of Occupational Health, the Employee Assistance Programme, and the support they can get from Human Resources (with regard to the implementation of this policy).

Managers should not hesitate to seek advice and/or support if they feel they need it.

Managers should also be aware of all other relevant policies (*you may want to list the relevant policies*). Such awareness enables better planning and decision making. For example, knowledge of the Flexible Working Policy will enable the manager to discuss appropriate options when discussing and developing plans to tackle stress-related problems. Information on policies is widely available (*list where*).

Managers need also to be aware of support services available to employees, of how to refer employees, and of how employees can self-refer.

The role of support services will be discussed as part of managers' training.

Employees' responsibilities

Stress is not a sign of weakness. Anybody at any time may experience stress for a variety of reasons. Employees should not hesitate to seek support if they are experiencing stress or feel they are at risk of stress. Employees should approach their manager for support in the first instance and are strongly encouraged to do so, but can approach HR or Occupational Health directly if, for whatever reason, they feel they cannot approach their manager. Employees are strongly encouraged not to suffer in silence, and to accept opportunities for support if offered e.g. counselling.

Managers have a responsibility for managing excessive workplace pressures. However, individual employees also have a clear responsibility to themselves and others to minimise excessive pressures and demands by behaving responsibly, acting reasonably and reporting any concerns regarding stress to managers. Managers cannot be expected to act on stress-related problems they don't know about.

Employees should avoid unnecessary absence. Excessive absence puts additional pressure on colleagues that may lead to those colleagues experiencing stress. Employees should refer to the Absence Management Policy if in any doubt.

Support for employees

All employees can now access a confidential telephone helpline and counselling service. Details are posted on all noticeboards and on all the usual communication channels e.g. intranet. Appointments can be made at any time, including during working hours. The service is free and confidential, and employees are encouraged to use this service, whatever the nature of the stress-related problem.

Workshops are now open to all employees (*mention whatever training is being made available to employees to help them manage stress*), where employees can learn ways to boost work-life balance, reduce stress, and improve their health generally. Information about workshops will be posted on all noticeboards, on the intranet and other communication channels. Employees should approach their manager or can approach HR/Training directly if they wish to attend. Support groups will be set up to promote positive mental health and well-being and good work-life balance.

Lack of skills, in a new role for example, can cause stress, and employees should not hesitate to approach managers to discuss training and development needs at any time.

Employees should not hesitate to seek support at any time. If employees feel that they cannot approach their manager about a stress-related issue, they should not hesitate to approach HR directly for support. Employees can also approach the Occupational Health Adviser for advice on stress-related problems or any health matter.

Where employees are experiencing stress that is having a significant effect on their health and well-being, ABC will support and work with the employee to look at all reasonable adjustments in order to minimise risk and facilitate a successful return to work. Employees can also get support from their Trade Union Representative.

Working Relationships

Good, supportive working relationships have a buffering effect against stress. Managers should be supportive, and all employees are encouraged to be supportive of each other. Poor working relationships have the opposite effect

and can be a cause of stress. Bullying and harassment, in particular, can cause severe stress. Employees should report cases of bullying or harassment in line with our Harassment Policy. Details of where employees can access support if they feel they are being bullied or harassed are posted on all communication channels.

Employees should not hesitate to discuss concerns directly with HR, or with Occupational Health if they feel they cannot approach their manager. (*You may have an informal route e.g. trained contact officers as part of your policy on bullying and harassment. If you do, mention this in your policy.*)

Evaluation and review

This policy will be evaluated by the Stress Policy Group over a 12 month period from the commencement date. Stress indicators will be monitored, as will the numbers of employees accessing support services. In addition, both quantitative and qualitative data will be gathered for evaluation purposes. The policy will be reviewed once the evaluation process is complete. Any comments or suggestions that employees have with regard to this policy are strongly encouraged. Employees can make use of suggestion boxes, email the Stress Policy Steering Group (*provide email address*), or use any other communication channel.

Appendices

The appendices to your stress policy can contain information relevant to your policy, for example:

- *Signs and symptoms of stress*
- *Causes of stress*
- *Summaries of training for managers and employees*
- *Details of support services and how they can be accessed*
- *HSE Management Standards information*

You could of course include information like this in the policy document. However, the main focus of the policy should, as previously stated, be action-oriented.

Specific roles with regard to the implementation and evaluation of the stress policy

Should you include specific support roles in your policy? In this section, we address this question.

Organisations vary enormously in terms of the way they are structured and the extent to which they have personnel who have specialist roles, usually support roles. If your organisation has dedicated HR, Health and Safety, Safety Reps, and Occupational Health give consideration as to whether you need to clarify their roles with respect to the implementation and evaluation of the stress policy.

In this model policy, we have somewhat played down these roles and not devoted sections specifically to them. The reasons for this are two-fold. Firstly, the model policy has placed such roles in the context of supporting managers and employees. Our view is that the role and behaviour of managers, and support for employees, should have prominence in the policy, and that placing the emphasis on these two areas is going to be more effective in the longer-term. The success of a stress policy will depend on what managers do to prevent and reduce stress and what employees do when they experience stress.

Secondly, because organisations are so different from one another, it would be wrong to give the impression that a successful stress policy depends on HR or Health and Safety or Occupational Health. Many organisations don't have these functions but that doesn't mean they can't develop a good stress policy, far from it. In fact, in many cases, SMEs, who often have no HR or Occupational Health provision, develop excellent policies, are caring employers, support their employees very well, and have low rates of absence and staff turnover as a consequence.

Therefore, think carefully about what you want to do with your policy. If you want to clarify these roles do so. Here are some questions to think about.

Human Resources

- *What role will HR have in terms of providing support to managers and employees?*
- *Are there specific circumstances where employees can/should approach HR directly?*
- *Will there be a role in terms of training and raising awareness of stress? What will that role be?*
- *What will HR's role be with regard to the monitoring of stress indicators e.g. absence and evaluation of the policy?*

Health and Safety

- *Will Health and Safety have a role in the stress risk assessment process? If so, what is that role?*
- *What is Health and Safety's role in terms of implementing and evaluating the policy?*

Occupational Health (this may be provided internally or externally)

- *What role will Occupational health play in raising awareness of the policy?*
- *When will employees experiencing stress or mental health problems be referred to Occupational Health?*
- *When would Occupational Health refer employees to other agencies?*
- *What support role will Occupational Health have in terms of stress-related absence and rehabilitation?*
- *What monitoring and/or evaluation role will Occupational Health have?*
- *How and under what circumstances will Occupational Health provide support to managers e.g. advising on reasonable adjustments?*

Safety Reps (if you have them)

- *How should Safety Reps be consulted on matters related to stress at work?*
- *Will Safety Reps have a role in the stress risk assessment process? If so, what role?*
- *What role will Safety Reps have in terms of monitoring and evaluation?*
- *Will Safety Reps be allowed time off to attend stress-related training?*

Writing and development stage checklist

- Have you thought about the training courses that will be needed?
- Have you planned, developed or sourced the support services/structures that you need?
- Have you developed/upgraded your management information systems to a point where they will be adequate for the needs of the policy?
- Have you developed (new) procedures for managing stress-related absence?
- How will the policy relate to, and integrate with, other policies?
- Have you written and tested the policy document?
- Have senior management sanctioned the implementation of the policy?
- Are you clear within the document about how and when the policy will be evaluated and reviewed?
- Does the policy demonstrate a duty of care and meet your legal obligations in terms of risk assessment?
- Have you consulted enough?

4. Implementation

This is the stage that often causes the most problems. The preparation, audit and development stages involve a lot of work, and it is very easy to rest on your laurels and think you've completed the task. You haven't! The whole effort will have been a complete waste of time if you don't implement the policy.

As we have been emphasising all the way through this document, the stress policy is largely about action, so now you need to act! You may have already completed many of the actions necessary to implement the policy. For example:

- You should have already thought through what training input you'll need
- You'll have the necessary support structures in place
- You may have upgraded your management information systems
- You will be clear about how you are going to assess stress risk
- You will have decided how stress-related absence will be managed

Your stress policy implementation priorities should be:

- Seeing it through
- Raising awareness of the stress policy
- Training
- Upgrading support structures if necessary

Seeing it through

Someone needs to make it happen, your Policy Coordinator and Steering Group are probably the best people to oversee the implementation stage. However, key individuals come into play. For example, it is likely that Senior HR and Training Managers will play an important role in sourcing or developing training. The Board or Corporate Management Team will need to make the necessary resources available. Your Occupational Health Advisors may also have a leadership role.

Raising awareness of the stress policy

One of the biggest jobs you have in implementing the policy is in raising awareness: about the issue of stress in general, about the stress policy, why it was introduced, and about 'what it will do for you'. It is also necessary to raise awareness of support structures inside and outside the organisation and what is expected of managers and employees.

We think the best analogy is with marketing. When you are marketing a new product, you have to put information about that product in front of people time and time again. Employees and managers will not take in key messages about the new policy until they have been exposed to them on many occasions. It is also vital to use a range of different communication channels; don't stick to one or two. Like marketing, raising awareness of your stress policy will be a never-ending task. You'll need to include information about it in induction training, on your intranet, on notice boards, on memos, in your staff newsletter, at health promotion events and so on. It is often best to assume lack of awareness because that keeps you working hard at the communication of the policy.

Training

You will already have given serious thought to the training your managers and employees need at the development stage. Now you must implement your training strategy.

As we have stated, the priority is management training because managers implement policy, and are at the front line in assessing, minimising and managing the risk. But training for all employees is also important. Training for employees should focus first on raising awareness.

A major goal of your stress training strategy should be to achieve **consistency of message and approach**. Training can also have a critical role in changing the culture of the organisation in a positive way. Our experience with regard to training and policy development suggests that the policy should lead and guide the training.

Management Training

The focus of management training should be on stress risk management – what managers need to know and do to minimise stress risks at work. Management training raises awareness of stress; covers the statutory obligations such as risk assessment; and provides input on what managers should do once a stress problem occurs.

There should also be strong emphasis on prevention and proactive approaches, and on managing people to enhance mental well-being, rather than merely to address problems.

Staff Training

Individuals have different training needs and there are a number of options you could consider. Training could focus on providing them with stress awareness and stress management skills, tools and techniques. This training helps and supports individuals in developing strategies and action plans to improve their health and well-being, and minimise stress. You could also offer more holistic workshops on lifestyle management, or maximising energy and performance. This training improves individual resilience at work, but also emphasises the importance of a good work-life balance.

In Equilibrium provides a number of training courses suitable for managers and staff, and can also develop bespoke training packages. Details can be found on our website <http://www.in-equilibrium.co.uk>

Training to address specific causes of stress

In Equilibrium also has expertise in providing training and consultancy solutions designed to tackle specific causes of stress (e.g. bullying and harassment, team cohesion and conflict). Please contact us if you would like support in tackling specific causes of stress at work on tel. 0800 622 6932.

Upgrading support structures if necessary

Although you will have already done work on developing support structures, our experience has been that it can become quickly apparent that support structures are not sufficiently developed to match commitments in the policy. If nothing is done, employee expectations will be dashed, leading to cynicism about the whole exercise. You may need to source new supports or upgrade existing support structures.

Implementation stage checklist

- Who is going to see it through? That is, who will oversee and lead the implementation of the stress policy?
- Have sufficient resources been made available in order to implement the policy in full?
- What are you going to do to raise awareness of the new policy (remember to use all communication channels)?
- Has training for managers been organised, scheduled and resourced?
- Has stress/lifestyle management training been made available to all employees?
- Are managers acting consistently and putting over a consistent message?
- Are employees complying with the policy?
- Are support services/structures working in the way you intended?

5. Evaluation and review

Don't forget to do this! All too often a huge amount of effort is wasted because evaluation and review aren't carried out.

Evaluation

Earlier in this whitepaper, we discussed the importance of policy objectives, and that for each objective you need to think about:

- How will we do that (implementation)?
- How will we measure that?

Stage 4 was about implementation. This stage is about measurement.

What you measure and how you measure it will depend on why you developed the policy. As you will certainly have had more than one policy objective, you should also measure the success of your policy in more than one way.

How to evaluate your policy:

- **Stress risk assessment (stress audit). This is now mandatory.** As stress risk assessment is something you must do legally, this is the most important single action in terms of evaluation. You should have completed a stress risk assessment at the benchmarking stage. This makes evaluation much easier, as you can use the same tools and process a year later to monitor progress and evaluate your stress management interventions. We recommend strongly that you base your stress risk assessment around the 6 categories of stress hazards identified in HSE's Management Standards. As we mentioned in the benchmarking sections, online technology now makes this much easier and more cost-effective. Please check out In Equilibrium's website for information on stress risk assessment and on how to access this technology <http://www.in-equilibrium.co.uk/consultancy/stress-risk-assessment>
- **Absence.** Absence can be a key stress indicator and you may have had the business goal of reducing absence. It is a worthwhile business goal and having a stress policy can certainly help in this regard. Should you focus on stress-related absence or overall absence? This is tricky because it's difficult to separate the two. Probably at least half of absence is stress-related, but doesn't always appear to be. For example many doctors won't put 'stress' on a medical certificate, because they think it might harm the employee's prospects. Sometimes this is due to pressure from the patient. Another problem is that absence levels may be influenced by a range of factors. For example, one month after introducing the policy, there may be a major reorganisation or restructuring. If major organisational change like this happens, it will probably raise stress and have an impact on absence levels. So be careful with evaluation using absence rates alone. You may or may not see a drop in absence, but that doesn't necessarily mean success or failure of the policy. So it isn't a good idea to base your evaluation purely on absence.
- **Attitude surveys or other survey data.** Surveys can be helpful and a good idea is to base surveys on your policy objectives. If, for example, you have as your objective the creating of a healthy culture and working climate, you could develop a survey specifically for the purpose of measuring culture and climate. Of course once you have done a survey once, you have a benchmark for future measurement. If you already do surveys, check out the data they generate. Although these surveys may not necessarily have been designed for stress-related issues, some of the data will more than likely shed some light on the success of the stress policy e.g. levels of job satisfaction, morale, perceptions of management etc.
- **Performance indicators.** We know that stress has a negative impact on work performance, so monitoring performance is of some relevance.
- **Staff turnover.** You may have had a goal of reducing staff turnover, because you think stress has been implicated. Again, take care with this one, especially if there is a lot of change. Organisational change may have a dramatic impact on staff turnover.
- **Exit interview data.** If you already monitor this, you'll know it can generate useful data, especially related to reasons for leaving. Stress is often one of those reasons. What's especially important about exit interviews is that they generate valuable qualitative data. That is, they provide insight into how people feel and their experience. As stress is largely based upon perceptions, this data can be very valuable when it comes to evaluating your stress policy.
- **Grievances and complaints.** Grievances and complaints often rise when employees are experiencing stress, so monitoring their number and nature can help with evaluation. Also, you may have a goal of reducing formal grievances and complaints, but you could also be monitoring their nature.
- **Reporting of stress?** Beware of this one. You would normally expect a rise in the *reporting* of stress if you introduce a policy because employees' and managers' awareness of stress has been raised. This is

good. It shows that the policy is having an effect. It's only once the policy beds in that you would expect such reporting to start to drop. Therefore, although it is a good idea to monitor the reporting of stress, you should look at such statistics critically and put them in the context of other measures.

- **Training evaluation from managers' and individual courses.** You should evaluate all training you introduce in line with your policy. For example, you will probably introduce training for managers in order to help them implement the policy, and you may introduce stress management training as a support service that all employees can opt into. If you do introduce such training any evaluation data will be highly relevant to the overall evaluation of the policy.
- **Employees' experience – focus groups.** As we have said, generating qualitative data is valuable, because individual perceptions and experience play a big part in whether stress is an issue or not. Focus groups are a means of generating such data. You need to take care when organising focus groups. Employers often think it's a good idea that focus groups be representative (i.e. to have people from the top, middle and bottom). This seems to make logical sense but rarely works in practice because the status differences inhibit communication. So it's often best to have focus groups comprising of employees at the same basic level. It will also help to have them facilitated by someone perceived as independent and who has expertise in facilitation. HSE have a good download related to running focus groups.

You will almost certainly have had legal reasons for the development of your stress policy. Think about how you will evaluate the success of the policy from a legal perspective.

You could monitor the number of tribunal and/or court cases, for example, or you could measure the amount paid out in settlements with regard to stress. You could, of course, have employment lawyers look over the policy to make sure it covers the right areas from a legal point of view. But the most important aspect will be in terms of compliance with the policy.

For example, key evaluation questions will be:

- Are risk assessments being carried out?
- Have all managers been trained?
- Are managers acting in accordance with the policy?
- Are managers acting consistently?
- Are managers providing support and making adjustments where appropriate?
- How aware are managers of internal and external support structures?
- How aware are employees of internal and external support structures?
- Are employees approaching managers about stress-related problems?
- Are employees utilising support structures provided?
- To what extent are support structures being used?

These are not directly legal questions for evaluation purposes but they certainly are *indirectly* because questions about risk assessment, consistent management action, support and awareness all influence legal risk. Think now about systematic ways of answering these questions. If you do, it will be an easier task when you come to evaluate and review the policy.

If your reasons are primarily political, how are you going to assess whether you have achieved your political ends? It could be that the development of the policy is an end in itself and that is what matters. It may be that monitoring the temperature of industrial relations is what's needed as there has been a lot of pressure from the Trade Unions on stress, and a political goal is a reduction in the temperature. It could be that the introduction of the policy helps you in a number of initiative areas. If this is the case, then success will be measured in the extent to which the policy helps achieve these initiatives.

Reviewing your policy

It is very unlikely (actually, impossible!) that your policy will turn out to be perfect. The first year may show up all sorts of niggling problems, for example, with support structures not being used or with a procedure that isn't being understood or followed. So, once you have evaluated, it is very likely that you'll need to review your policy.

Here are some questions to consider:

- Who is taking responsibility for reviewing the policy?
- What's working well?
- What needs tweaking, adapting, or completely changing?
- Are managers following the policy? If not, what interventions (e.g. training and development) are needed to improve compliance and consistency?
- Do support structures need to be changed, or employees made more aware of them?

- Are there aspects of the policy document that need to be re-written?

Evaluation and review stage checklist

- Why did you introduce your policy?
- Has the policy achieved what you hoped it would? Have the policy objectives been achieved?
- Have you collated all necessary quantitative and qualitative data necessary for evaluating the policy?
- Did the policy and actions associated with it positively influence organisational culture?
- Did the policy influence management behaviour such that stress risks were minimised?
- Did employees use the support services and structures provided?
- Based upon your evaluation, have you reviewed your policy?

Final thoughts

If there's one lesson we've learnt in all our work in the stress field it is this: you must act. You cannot afford to do nothing. Rarely have stress-related problems become disasters because managers did the wrong thing. It was usually because they didn't do anything at all! Therefore policy development and implementation needs to focus on actions, what you will do to prevent and reduce stress and mental health problems at work. Don't worry if your policy is not long on fancy words. As long as it meets your legal obligations, it says straightforwardly what managers should do, and how employees who are experiencing problems can access support, you are well on your way to success.

