Workplace Mental Health and Safety

Corporate Risks and Opportunities for Financials, Mining and Utilities Companies in the S&P/ASX200

July 2015

acsi

Foreword

Investors recognise that sound workplace health and safety in both the physical and mental domains are integral to not only the well-being of people but also to the long-term sustainability of companies. When workforces are managed without adequate regard for their health and safety, the potential for operational, financial, reputational and legal risks is significant. Conversely, companies can benefit from the cost savings associated with better safety, greater productivity, strong workplace health and safety credentials, and lower workforce-turnover, presenteeism and absenteeism.

With this report, ACSI has undertaken an exploration of what information is disclosed by ASX200 financials, mining and utilities companies- with the aim of starting a conversation between investors and companies to raise awareness of material social governance risks and opportunities related to workplace mental health and safety.

On the one hand, a sizeable proportion of ASX200 financials, mining and utilities companies have publicly disclosed commitments to implementing workplace initiatives such as wellbeing programs, flexible workplaces, training and development, tracking employee satisfaction and engagement through surveys and the provision of volunteering programs. On the other hand only a small proportion of companies disclose qualitative or quantitative information on issues such as utilisation of employee assistance programs, employee satisfaction levels, staff turnover rates, training data, absenteeism, or overtime worked. Without disclosure of both lead and lag indicators of workplace mental health and safety, it is difficult for investors to ascertain the success of initiatives employed.

Based on the findings of this research, workplace mental health and safety will feature in ACSI's extensive engagement program with companies to ensure that investors can accurately consider workplace mental health and safety in conjunction with other environmental, social and governance risks and opportunities to make well-informed decisions on the management of their members' financial assets.

Kind regards

Louise Davidson
Chief Executive Officer

Table of contents

About ACSI

ACSI is a collaboration between 29 Australian profit-for-members superannuation funds and six major international pension funds and asset owners, who have joined together to efficiently advance their collective ownership rights to improve the management of environmental, social and governance (ESG) investment risks and opportunities by Australian listed companies.

Full details on ACSI and its research publications, policy positions and membership are available on our website at www.acsi.org.au.

ACSI's Australian member funds in aggregate manage over $400 billion of superannuation assets on behalf of more than 8 million Australian superannuation fund members. Of this total, approximately 30% is invested in Australian listed equities, which translates to approximately 11% of the average ASX200 listed company, and growing in accordance with the growth of the Australian superannuation industry generally.

ACSI's mission is, therefore, to enhance sustainable long-term value for the retirement savings that are entrusted to our Members as fiduciary institutional investors. ACSI achieves this by representing the collective rights and interests of Members through influencing companies, investors, government and opinion leaders.

The focus of ACSI's research, policy and representation is environmental, social and governance (ESG) investment risks and opportunities.

Specifically, ACSI works on behalf of its Members in three key areas:

Research & policy formation

Identifying the most significant ESG issues for investors.

Company engagement & voting advice

Engaging directly with companies on behalf of Members, and advising Members on how to exercise their formal ownership rights.

Engaging with regulators & other system-wide market participants

Ensuring that markets are oriented towards beneficiaries and focussed on the long term.
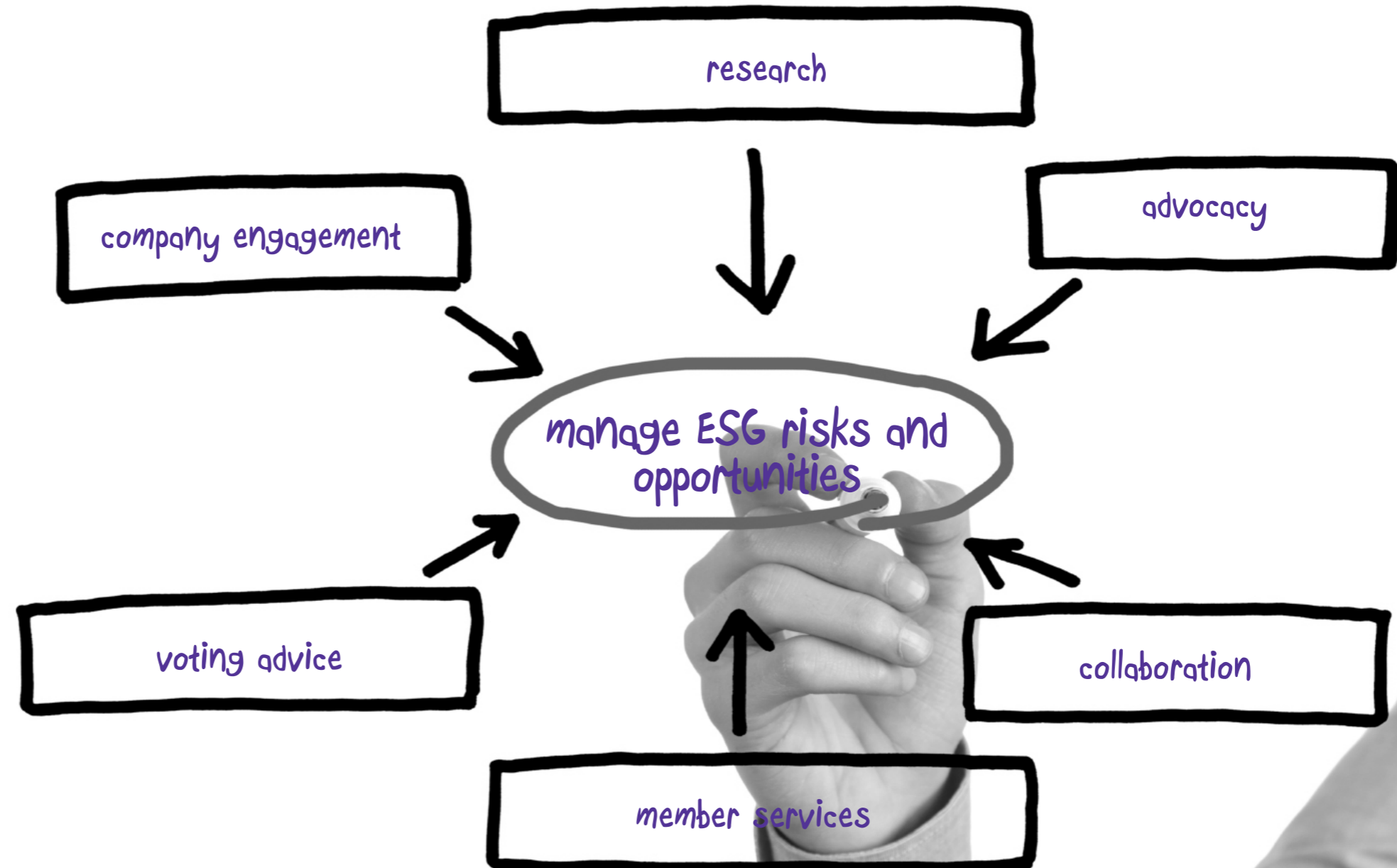
1. Executive summary

A reduction in the stigma often associated with mental illness, coupled with a better understanding of corporate practices in Australia are essential steps in the process of addressing the risks arising out of mental ill health in the workplace.

The report takes stock of workplace mental health factors within financials, mining, and utilities companies in the S&P/ASX200 (ASX200), and examines how these companies communicate publicly about these factors. These sectors were selected for in-depth analysis in the research as studies show that they are some of the most highly exposed to risks and opportunities associated with workplace mental health and safety.

The research undertaken for this report shows that a sizeable proportion of ASX200 financials, mining and utilities companies have publicly disclosed commitments to implementing workplace initiatives such as wellbeing programs, flexible workplaces, training and development, tracking employee satisfaction and engagement through surveys and the provision of volunteering programs. Many companies have also publicly disclosed formal grievance mechanisms and employee assistance programs (EAPs) to provide support to employees that experience bullying, harassment, stress, or forms of mental illness.

Financials

- Wellbeing programs or initiatives are reported by 75% of companies.
- Formal initiatives to enable flexible workplaces are reported by 92% of companies.
- Training and development opportunities are reported by 96% of companies.
- Indications of employee engagement are reported by 88% of companies.
- Formal employee volunteering opportunities are reported by 83% of companies.
- Formalised grievance mechanisms are reported by 67% of companies.
- Access to employee assistance programs or other counselling is reported by 75% of companies.

Mining and Utilities

- Wellbeing programs or initiatives are reported by 54% of companies.
- Formal initiatives to enable flexible workplaces are reported by 75% of companies.
- Training and development opportunities are reported by 71% of companies.
- Indications of employee engagement are reported by 58% of companies.
- Formal employee volunteering opportunities are reported by 42% of companies.
- Formalised grievance mechanisms are reported by 71% of companies.
- Access to employee assistance programs or other counselling is reported by 58% of companies.

While there is a high level of commitment across a range of workplace aspects, to date there is little information on the success of the initiatives implemented. Only a small proportion of companies disclose qualitative or quantitative information on issues such as utilisation of EAPs, employee satisfaction levels, staff turnover rates, training data, absenteeism, or overtime worked. This stands in stark contrast to the observed very high disclosure rates for physical health and safety, in particular for the mining and utilities companies in the ASX200.

Financials

- 33% of companies disclose workforce turnover rates.
- 25% of companies disclose details on workforce satisfaction.
- 13% of companies disclose detailed quantitative training data.
- 21% of companies disclose absenteeism rates.
- 4% of companies disclose overtime and extra time worked.

Mining and Utilities

- 29% of companies disclose workforce turnover rates.
- 25% of companies disclose details on workforce satisfaction.
- 25% of companies disclose detailed quantitative training data.
- 4% of companies disclose absenteeism rates.
- No companies disclose overtime and extra time worked.

In Australia's mining sector, stress faced by workers in fly-in fly-out (FIFO) or drive-in drive-out (DIDO) work arrangements has been a focus of public debate around workplace mental health. While 79% of metals and mining companies in the ASX200 have FIFO workforces, and there is evidence of significant challenges associated with FIFO workforce mental health, only 33% of these companies disclose details of initiatives that contribute to improved mental health through family friendly rosters or other family friendly programs.

> "Only a third of ASX200 metals and mining companies with FIFO workforces disclose details of improved work-life initiatives to address the significant challenges associated with mental health faced by workers."

The research found that ASX200 financials, mining and utilities companies lag sector peers in the UK and Europe in regard to physical and mental health and safety disclosure, with 58% of financials companies practicing moderate or good disclosure while 87% of industry peers in the UK and 73% in Europe fall into the same categories of disclosure. Similarly 83% of ASX200 mining and utilities companies practice moderate and good disclosure while all industry peers in the UK and Europe fall into the same categories of disclosure. There is therefore a strong case for investors to engage the Boards and senior executives of companies they are invested in both locally and abroad to raise awareness and improve disclosures on these issues.

> "ASX200 financials, mining and utilities companies lag sector peers in the UK and Europe in regard to physical and mental health and safety disclosure."

1.1   Key actions for investors

Please note that this is not an exhaustive list, but rather a summary of suggestions to expand the conversation on workplace mental health and safety:

- Engage the boards and senior executives of companies invested in to raise awareness of and improve disclosures on workplace mental health and safety.
- Raise the issue of leadership support for de-stigmatisation of mental illness in conversations with the boards and senior executives of the companies in which you invest.
- Engage with companies that disclose poorly on human capital management when compared to industry peers around how human capital management is viewed and where it sits within business strategy.
- Ask for detail on what training and development opportunities are available to staff to better understand how workforces are engaged to match their skill levels to the work conducted.
- Start a multi-stakeholder conversation on how the progress of initiatives for workforce mental health and wellbeing can be best measured and supported.
- Request absenteeism rates, details on workforce satisfaction metrics and performance over time.
- Engage with relevant companies on the outcomes of plans and systems in place to manage workplace stress.

Next steps

ACSI plans to extend the conversation on mental health in its ongoing engagement program on the basis of information collected as part of this report.

2. Introduction

It is estimated that close to half of the adult population of Australia will experience mental illness at some point in their lives, and one in five people experience mental illness in any given year[1]. These are statistics that are mirrored in most workplaces. A recent study by PwC estimates the cost to Australian businesses of mental illness at $11 billion per year. It is inevitably in the interests of workers, employers and investors to ensure mental wellbeing in the workplace. Australians spend approximately a third of their adult lives at work. The workplace is not only an important impactor and protector of health, but also a key avenue for health promotion.[2]

Workplace mental health is complex to measure and report. Individual mental wellbeing is impacted by personal experiences, personality factors and multiple workplace factors. The balance between home and work priorities also plays a significant role[3]. Given the well-researched negative impacts that physical and mental health risk factors can have on businesses and workers, an appropriate intervention requires not only a timely response but one which is effective and incorporates prevention strategies that may be required.

Obligations to provide a physically and mentally safe workplace are enshrined in Australian Commonwealth and State legislation, and the cost reductions created through decreased absenteeism and presenteeism offer incentives for companies to act. Investment in mental health not only protects workforces from negative impacts in the workplace, but also raises workforce participation and productivity, and contributes to resilience in times of fast paced change.

This report takes stock of known workplace mental health risk factors, and disclosure of these factors by companies within some of the more highly exposed sectors of the S&P/ASX200 (ASX200) finance, utilities and mining sectors. These sectors were selected for in-depth analysis because of their apparent higher than average exposure to workplace mental health risks[4] (discussed further in Methodology) namely, finance, utilities and mining.

The report begins with a discussion of the research process undertaken, and how companies were selected (methodology). This is followed by background and context on workplace mental health risks and opportunities. The second part of the report investigates current physical and mental health and safety disclosure practices of ASX200 companies in the above-mentioned sectors. The research considers how listed Australian companies disclose the ways they measure and address the mental wellbeing of their workforces by benchmarking ASX200 companies in the Australian context, and against international peers.

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1   PwC 'Creating a mentally healthy workplace: Return on investment analysis' (2014).
2   Cordia Chu, Tim Driscoll and Sophie Dwyer (1997); International Labour Organization Geneva, (1995); World Health Organization, (1997).
3   National Mental Health Commission and Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014).

4   PwC (2014).

3. Methodology

3.1   Research process

In total 48 companies in the finance, mining and utilities sectors were examined for this report. Companies were chosen based on their Global Industry Classification Standard (GICS) sector classification, and inclusion in the S&P/ASX200 index. Research was based on a desktop review of publicly available company communications and self-reported initiatives between March 2014 and March 2015. The specialist ESG research house CAER conducted the research and analysis that is disclosed in this report. Data considered in the report references a mix of indicators (see Appendix A) and is also based on information accessed via CAER's research partner EIRIS. Readers should note that companies were not specifically surveyed to collect data for this report.

Sources that were analysed for the purpose of this research include company websites, annual reports, Workplace Gender Equality Agency reports, and sustainability reports. Information from the EIRIS database was drawn upon for the international comparison section (see page 28). This report does not suggest that companies with poor disclosure are not implementing workplace mental health and wellbeing policies or programs. Information concerning these areas may not have been publicly available during the research process. It may be that a number of companies are active in the areas assessed in this report, but do not openly disclose their policies and actions.

Feedback should be provided to info@acsi.org.au.

3.2   Selection of companies for this report

While all workplaces are exposed to mental health challenges in some form, there are workplace risk factors and opportunities that suggest an initial focus on a sub-set of industries.

In particular, white collar workers may be increasingly stressed as 'the changes in the nature of work in recent times have seen increased pressures of work intensification and job insecurity permeating all types and levels of jobs[5].' It has recently been reported that there has been a 'surge in mental health and disability claims from stressed white-collar workers [that] is hitting the profits of Australian insurers, which paid out nearly $10 billion in claims last year.'[6] Workers in the financial sector have a higher rate of self-stated mental health issues with around two thirds of people experiencing some type of negative impact as a result of work.[7] This raises concerns that workplace risks may not be managed as well as they could be.

Furthermore, international research has found that since the global financial crisis (GFC), financial services workers are under pressure from narrowing job prospects and threats of redundancy[8]. Similar research is lacking in Australia, highlighting a gap in our knowledge of mental health in this industry.

While other industries show similar proportions of employees suffering from mental health issues, the mining and utilities sectors have been highlighted as having the highest returns on investment when investing in systems to support mentally healthy workplaces[9], and that the utilities sector has the second highest prevalence of mental health conditions after the finance sector[10].

There are conflicting views on the level of mental health concerns in the utilities sector. Some reports suggest it is lower[11] than other industries such as construction, and other reports suggest it is higher[12]. These conflicting views highlight the need for more research into this sector.

Mining workers have been the focus of the workplace mental health debate in Australia in recent times, especially since a reported spike in suicides of Fly-In-Fly-Out (FIFO) workers in Western Australia. The majority of workers in the mining sector are males aged between 25 and 34 years, which is the highest risk-exposed group for poor mental health. In addition, studies have found that mining is the sector with the highest prevalence rate of substance abuse and the highest levels of work-family conflict[13]. Work-family conflict and substance abuse can both be the cause and the product of mental health issues. It is important to note that there is a greater prevalence of depression in rural areas, where a majority of mining work is undertaken. Lack of access to services, and separation from family and friends have been cited as factors of significant detriment to the mental health of these workers[14].

In light of the workplace risks and opportunities inherent in this sub-set of industries, the research undertaken covers ASX200 companies in the following GICS sectors, following the rebalance of the ASX200 constituents effective 20 March 2015:

- GICS Sector: Financials, excluding companies in GICS Industry Real Estate Investment Trusts (REITs) and GICS Industry Real Estate Management & Development.

- GICS Sector: Utilities.

- GICS Industry: Metals and Mining.

A percentage breakdown of companies by sector is displayed in Figure 1.
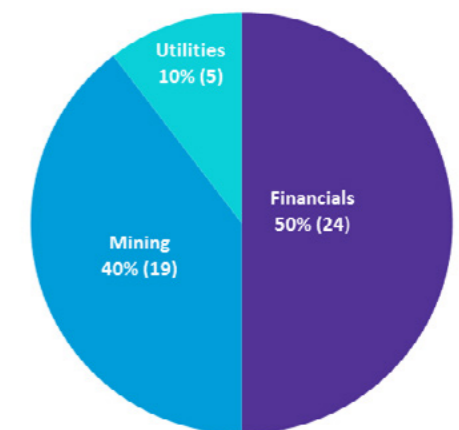
Figure 1 - Proportion of companies analysed for this report by sector

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5   R Callus and R Lansbury, Working Futures: The Changing Nature of Work and Employment Relations in Australia (eds). (NSW: Federation Press, 2002).
6   R Liew, 'Stressed White-Collar Workers contribute to Insurer TAL's $1 Billion in Claims', The Sydney Morning Herald, (19 May 2015).
7   Go Home On Time Day survey, August 2014, The Australian Institute.
8   P Clarke, 'The seven mental disorders most prevalent in financial services', efinancial careers, (17 May 2013).

9   PwC (2014), p28.
10 Ibid., p14.
11 AM Roche, et al. (2012).
12 PwC (2014).
13 Ibid.
14 Education and Health Standing Committee 'Shining a Light on FIFO Mental Health: A Discussion Paper' Legislative Assembly Parliament of Western Australia, (November 2014).

GICS sectors provide a basis to group companies in comparable terms for a variety of stakeholders. While this representation is deemed most appropriate for this report, it is acknowledged that companies within any one sector are not always neatly comparable, and there are companies within other sectors that may have relevance and greater comparability to the broad sample of companies assessed in this study. For example, companies involved in the extraction of energy resources (i.e. coal and uranium) were not included in this report as they fall into the 'Energy' group of GICS sectors. Similarly, companies with activities that cross sector or industry classifications may fall into a classification outside the scope of this report, even if they have significant activities for example in the utilities space. For ease of representation, the small number of GICS sector 'Utilities' companies in the ASX200 (five in total) were grouped with those in the GICS Industry 'Metals and Mining'.

For the international comparison component of this report data for companies in the FTSE All World Developed index excluding Australian companies in the sectors detailed above were chosen. Companies were assigned regions on the basis of the country of incorporation of the parent company. Data for the international benchmark was accessed via the EIRIS Global Platform, an ESG data platform that allows access to a range of corporate ESG data and information tools (See www.eiris.org).

3.3 Company perspectives

Five company perspectives on workplace mental health and safety are included in this report- BHP Billiton, Medibank Private, National Australia Bank, AGL Energy, and Independence Group. These companies provided their experiences and initiatives in regard to workplace mental health. They were chosen based on the following criteria:

- Evenly spread representation of the sectors researched for this report.
- Evenly spread representation of companies of large and small market capitalisation.
- Willingness to participate.
- Publicly available or anecdotal evidence of activity on workplace mental health and safety.

3.4 International benchmarking scores

To benchmark Australian listed companies with international peers, aggregated workplace health and safety factor scores were used. Comparisons were made across the following countries and regions:

- UK.
- Europe.
- Asia Pacific, excluding Australia.
- North America.

The factors considered in the aggregated scores are described in Appendix A- Methodology supplement (see page 31).

4. Physical and mental wellbeing

Background

In November 2014, the National Mental Health Commission reported that in addition to the almost 700,000 people with severe mental ill health, around 3 million people in Australia suffer from mild to moderate mental ill health in the form of conditions such as anxiety and depression (see Figure 2). The Commission also reported that less than half of those suffering such symptoms seek professional help[15].

Figure 2 - Annual distribution of mental ill-health in Australia, Source: National Mental Health Commission, November 2014

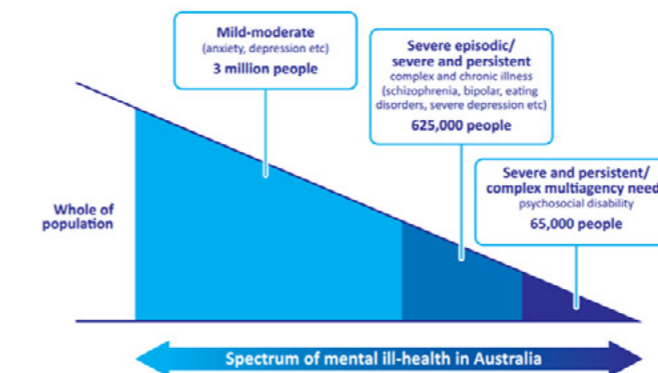In view of these statistics, it is not surprising that physical and mental health and safety at workplaces in Australia continues to be a focus of state governments, the federal government as well as international organisations.

Work is generally viewed as beneficial to mental health and personal wellbeing. It provides people with structure, purpose and a sense of identity. It also provides opportunities for people to develop and use their skills, to form social relationships, and increase their feelings of self-worth[16]. In recent decades, significant changes to the management, organisation and structure of work have occurred resulting in less physically active workforces. This has coincided with increasing mental hazards at workplaces.

As such, an emerging risk and key challenge in modern occupational health and safety management is the effective detection, management and prevention of risks associated with workplace health. Bircher defines health as 'a dynamic state of wellbeing characterised by physical, mental and social potential, which satisfies the demands of a life commensurate with age, culture, and personal responsibility'[17]. Mental health relates to a state of mental, emotional, social, and spiritual wellbeing[18].

Mental variables fall into two categories. The first consists of psychological attributes like hostility, depression, feelings of hopelessness, and so on, which exist at the individual level, and are likely to be a result of the process of socialisation. The second category is external, related to structural environment, and can include workplace conditions[19].

Improving the physical and mental health and safety of workers requires understanding and identification of the factors that impinge on the health and safety of workers. A recent study urged occupational health and safety legislators and policymakers to consider, 'beyond physical demands, factors usually associated with risk for mental stress claims (e.g. harassment, bullying, and violence) may additionally manifest in physical health problems and workers compensation injury claims.[20]'

4.1 Workplace health and safety legislative requirements and the link to mental wellbeing

Workers' physical and mental health can be adversely affected by exposure to a number of risk factors, which can range from poorly designed or managed work environments, and excessive or conflicting work demands, to job insecurity or harassment. There is legislation in place to ensure that not only are workers physically and mentally healthy, but that workplaces have a safe and healthy system of work. Work Health and Safety Acts have similar or 'harmonised' laws at both Commonwealth and State level for all Australian States and Territories except Victoria and Western Australia. In Victoria and Western Australia, individual Occupational Health and Safety Acts apply.

A second type of legislation, Workers' compensation laws, has as its main objective the compensation of workers who suffer an injury, as well as the management of workers' injuries to enable return to work. These laws take into account 'diseases' suffered by workers which may include mental injuries, stress and other psychological conditions. Claims for psychological injuries must demonstrate that the workers' employment was the major contributing factor to the injury or disease.

This attribution of mental health conditions to the workplace can be complex and challenging. At mild to moderate levels, many mental diseases and injuries are not easily clinically diagnosable medical conditions, and in many cases it is difficult to prove the direct relationship of the illness to workplace conditions. The mental health of an individual is often impacted through a range of factors, of which the workplace is one. It is usually only when these conditions develop into physical and/or mental disorders that they are clinically diagnosed. The mental wellbeing of a person can be a subjective and personal experience, and employers or businesses are often not able to determine the 'authenticity' of such claims.

15 National Mental Health Commission, Report of the National Review of Mental Health Programmes and Services Summary (2014), Available at: http://www.mentalhealthcommission.gov.au/media/119896/Summary%20%20-%20Review%20of%20Mental%20Health%20Programmes%20and%20Services.PDF
16 Australian Government, Comcare, Working Well: An Organisational Approach to Preventing Psychological Injury (April 2008) Available at: http://www.comcare.gov.au/__data/assets/pdf_file/0005/41369/PUB_47_Working_well.pdf
17 J Bircher, 'Towards a Dynamic Definition of Health and Disease', Medicine Health Care and Philosophy (2005), Vol. 8(3), 335-41. The World Health Organization (WHO) defines it as 'Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'. Refer, Preamble to the Constitution of the World Health Organization as adopted by the International Health Conference, New York, 19-22 June, 1946, signed on 22 July 1946 by the representatives of 61 States (Official Records of the World Health Organization, No. 2, p. 100) and entered into force on 7 April 1948.
18 Australia Bureau of Statistics, Measuring Wellbeing: Frameworks for Australian Social Statistics (2001). Available at: http://www.abs.gov.au/ausstats/abs@.nsf/0/BCDF2C64DD5B539CCA2571B90011998C?opendocument

19 A Singh-Manoux, 'Psychosocial Factors and Public Health', Journal of Epidemiology and Community Health Vol. 57 (2003) 553–554.
20 TS Bailey, MF Dollard, SS McLinton and PAM Richards, 'Psychosocial Safety Climate, Psychosocial and Physical Factors in the Aetiology of Musculoskeletal Disorder Symptoms and Workplace Injury Compensation Claims', Work & Stress: An International Journal of Work, Health & Organisations, Vol. 29:2 (2015), 190-211.

Nonetheless, legislative requirements relating to the physical and mental health of workers place a legal obligation on duty holders, such as employers, supervising workers, persons conducting a business or undertaking, and company officers. By law, measures must be put in place that will ensure workplaces are kept safe and healthy. This includes processes which systematically identify, assess and control physical and mental risks by eliminating or reducing the effect of risk factors.

4.2 Mental health and safety risk factors

An understanding of the magnitude of workplace physical and mental risk and how risk factors interact and affect the health, wellbeing and productivity of workers can be obtained through measurement and analysis at both individual and organisational levels. Some of the risk factors that have been identified include 'poor working conditions, job demands, job overload, job insecurity, work-life imbalance, and work settings conducive to risky alcohol or drug use[21].'

Apart from some of the intrinsic risk factors related to the nature of work mentioned above, the organisational and management risk factors associated with physical and mental health in the workplace can be grouped as follows:

- Organisational change.
- Leadership styles.
- Ineffective or unsuitable work systems.
- Workplace relationships.

4.2.1 Organisational Change

Risk factors at the organisation level refer to 'systems or norms affecting the organisation as a whole and processes that are implemented across the entire business[22].' These usually result from organisational policies and procedures and the work culture of the organisation. Examples of such risk factors include poorly managed technological change, change in work methods, outsourcing of work, organisational change, and job insecurity.

4.2.2 Leadership Styles

The health and safety of workers can also be affected by the leadership styles of the organisation. 'Leaders establish values, develop and implement policies and enforce accountability, and they can be the initiators and supporters of a culture of blame or of a no-blame approach[23]'. A leadership style which is supportive and encourages innovation and improvement in workers would most likely enhance their wellbeing and health in the workplace[24]. On the other hand, a leadership style which is autocratic or laissez-faire, has inadequate employee involvement, lacks proactive interventions, has excessive or conflicting work demands, or has poor communication may adversely affect the workers' health and enjoyment of their work.

4.2.3 Ineffective Work Systems

Studies have found that when workers are exposed to ineffective or stressful situations such as work overload, lack of resources or training, poor supervisory support, low input into decision-making, job uncertainties, ill-defined operational policies and procedures, or poor work design[25], there may be a range of debilitating physical and mental health outcomes. These may include 'depression, anxiety, emotional exhaustion, immune deficiency disorders and cardiovascular disease[26]'.

4.2.4 Workplace Relationships

Workplace relations are often a contributory risk factor. Stressful working conditions have an indirect impact on workers as they may limit their ability to make positive work-life changes or directly contribute to negative health behaviours[27]. Risk factors associated with workplace relationships include interpersonal conflict, worker exclusion, unfavourable social context of work, poor workplace interactive synergies, excessive or conflicting work demands, poor communication and lack of support, lack of participation and influence over the way the job is done, psychological and sexual harassment and third-party violence.

4.3 The cost of mental illness

Mental health conditions represent a significant cost to Australia's economy through factors such as loss of productivity and less people in the workforce. The Australian Bureau of Statistics estimates the annual cost of mental illness to the Australian economy as a whole at $20 billion. This figure takes account of both a loss of productivity and labour force participation[28].

The $11 billion estimate by PwC that was stated at the outset represents the proportion of this overall cost that is borne by business[29]. It is comprised of three factors: absenteeism, that is people taking sick days; presenteeism, meaning people who are at work but are not as productive as normal; and mental health related compensation claims. As shown in Figure 3, it is estimated that absenteeism costs employers $4.7 billion, presenteeism costs $6.1 billion and mental health related compensation claims cost $146 million annually.
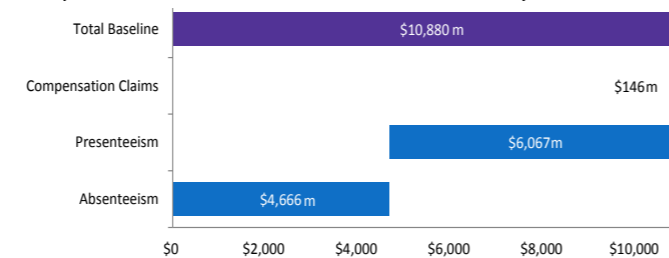

Figure 3 - Cost of mental health conditions (per year), Source: PwC (2014), creating a mentally healthy workplace: Return on Investment Analysis

A further study[30] by Safe Work Australia examined the cost of mental health related absenteeism and presenteeism and determined an annual cost of $8 billion to Australian employers. This report found that job strain, bullying and long work hours are a major cause of mental ill health resulting from the workplace. Furthermore this study found that if the mental wellbeing of the bottom 25% of physiologically healthy Australians was raised to that of the top 25%, Australian employers could potentially save $17.8 billion overall.

There is clearly some degree of variance in estimates of the cost of mental health within existing research. This can be attributed to differences in research methodologies and varying estimates of the number of Australians suffering mental illness. Nonetheless, it is clear that the cost of mental illness is significant.

4.4 Investing in good mental health

Organisations and companies play an important role in enhancing mental health in the workplace. One recent analysis suggests that for every dollar spent on successfully implementing mental health action, an organisation can expect an average return of $2.30[31]. This return is primarily in the form of increased productivity, fewer days of absent staff and fewer mental health related compensation claims.

Certain industries are set to benefit more from mental health actions than others. For example, the mining industry could receive a benefit of $15 for every one dollar invested in mental health[32]. It is estimated that the cost of mental health to the NSW mining industry alone is around $320 million to $450 million per year[33] while the cost to the industry overall through reduced productivity is $2.6 billion annually.[34] This provides a strong motivation for the industry to invest in mental health programs. Similarly, the utilities sector has the potential to receive higher than average returns on mental health investment.

4.5 Employee perspectives

In August 2014, a survey commissioned by The Australia Institute asked employees from a range of sectors how work arrangements impact on wellbeing[35]. This included impacts such as stress or anxiety, impacts on mood levels, inability to enjoy daily activities, impacts on sleep, inability to concentrate, alcohol or drug use, and impacts on general mental wellbeing.

Figure 4 illustrates the self-stated impact of work arrangements on mental health[36] by sector category for financials, mining and utilities. The breakdown by sector category suggests that the trend for mining and utilities is similar to the Australian average at around 54%. Workers in the finance sector have a higher rate of self-stated mental health issues with around two-thirds of people experiencing some type of negative impact as a result of work.
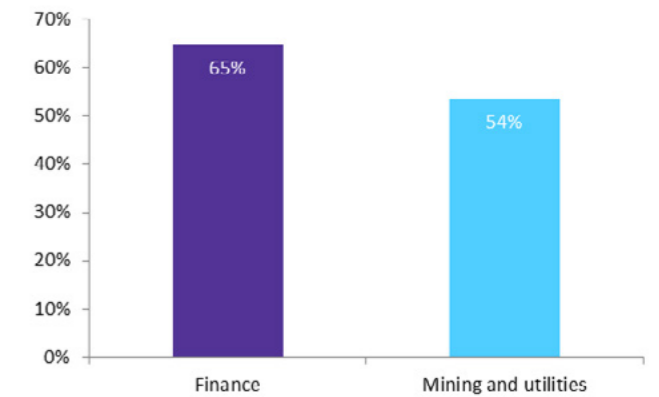

Figure 4 – Percentage of workers self-stating that work arrangements negatively impact on mental health, by sector category for Financials and Mining and Utilities, Source: Go Home On Time Day Survey, August 2014

A central theme for promoting the mental health of employees is to reduce the stigma associated with mental illness. Open discussion and voluntary disclosure of mental health issues has been found to facilitate this[37]. A survey conducted for the annual Go Home On Time Day in September 2012 examined how comfortable employees were with discussing mental health issues with their employer. The results show that the majority of people who work in mining and utilities are uncomfortable discussing their mental health with their employer.[38] See Figure 5.
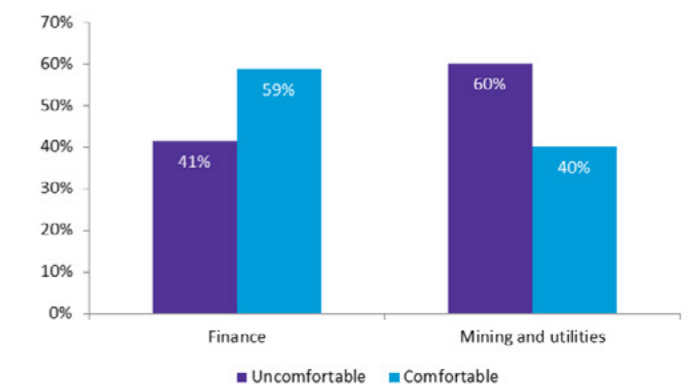

Figure 5 – Percentage of employees disclosing perceived ability to discuss mental health with their employer, Financials and Mining and Utilities, Source: Go Home On Time Day Survey, September 2012

Research has shown that there is greater stigma about discussing mental health in male dominated industries such as utilities, and that workers in the mining industry are scared of discussing mental health issues because of a fear they will lose their jobs[39].

The mining industry has shown some recognition of the risks associated with mental health issues amongst its workforce, in particular FIFO workers, and has released a guide to promote mental health in the workplace[40]. Research on mental health promotion in the utilities sector is less available. While companies are beginning to take steps towards investing in the mental health of their staff, there is still considerable room for improvement and consequently considerable benefit that can be gained.

21   AM Roche, J Fischer, K Pidd et al., 'Workplace Mental Illness and Substance Use Disorders in Male-Dominated Industries: A Systematic Literature Review' National Centre for Education and Training on Addiction (NCETA), (2012) ii.
22   SB Harvey, S Joyce, L Tan, et al., Developing a Mentally Healthy workplace: A Review of the Literature: A Report of the National Mental Health Commission and the Mentally Healthy Workplace Alliance (November 2014) 20.
23   B Sherriff, Promoting effective health and safety leadership: using the platform in the model Work Health and Safety Act (Safe Work Australia, 2011).
24   National Mental Health Commission and the Mentally Healthy Workplace Alliance, Harvey, S.B, et al., Developing a mentally healthy workplace: A review of the literature.

25   E De Croon, J Sluiter, P Kuijer and MoniqueFrings-Dresen, 'The Effect of Office Concepts on Worker Health and Performance: A Systematic Review of The Literature', Ergonomics, Vol. 48:2 (2005) 119-134.
26   S Michie and S Williams, ' Reducing Work Related Psychological Ill Health and Sickness Absence: A Systematic Literature Review', Occupational and Environmental Medicine (2003) Vol. 60, 3-9; A Noblet and AD Lamontagne, 'The Role of Workplace Health Promotion in Addressing Job Stress', Health Promotion International, Vol. 21: 4 (2006), 346-353.
27   PA Landsbergis, PL Schnall, DK Dietz, K Warren et al., 'Job Strain and Health Behaviours: Results of a Prospective Study', American Journal of Health Promotion, Vol. 12 (1998) 237-245.
28   Australian Bureau of Statistics, Gender Indicators: Mental Health, January, (2013) Cat No: 4125.0
29   PwC 'Creating a mentally healthy workplace: Return on investment analysis' (2014).

30   MF Dollard, T Bailey, S McLinton, P Richards, W McTernan et al. The Australian Workplace Barometer: Report on Psychosocial Safety Climate and Worker Health in Australia (2012). Magill, SA Centre for Applied Psychological Research, University of South Australia.
31   PwC 'Creating a mentally healthy workplace: Return on investment analysis' (2014).
32   Ibid.
33   M Sweet 'Putting the spotlight on mental health in the mining sector', Crikey, 30 March 2014, Available at: http://blogs.crikey.com.au/croakey/2014/03/30/putting-the-spotlight-on-mental-health-in-the-mining-sector/
34   Mining Skills Australia, Mental Health Hazards – Breaking Barriers to Bottom Lines, Available At: http://www.miningskillsaustralia.com.au/mental-health-hazards.html [Accessed 25 Mary 2015]
35   The Australia Institute Go Home On Time Day Survey, August 2014. Note: Though the sample sizes for the mining and utilities sector are small, this data is one of very few surveys known to examine trends in these industries. The sample size for finance is larger, reflecting the larger portion of the Australian workforce in this sector. Sample sizes: Mining (n=21), Utilities (n=7), Finance (n=34).
36   This refers to work arrangements negatively impacting on any of the following: stress or anxiety levels, mood most of the day, ability to enjoy daily activities, sleep, ability to concentrate, mental wellbeing, alcohol or other drug use.

37   National Mental Health Commission and the Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014)
38   The Australia Institute Go Home On Time Day Survey, September 2012. Note: Sample size too small for statistical analysis.
39   National Mental Health Commission and the Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014).
40   C Latimer, 'NSW mining supporting mental health in the resources industry', Australian Mining, (17 March 2014).

5. Voluntary company reporting
Current practices and performance

The following sections of this report focus on companies in the finance, mining and utilities sectors. These sectors were chosen due to the high prevalence of mental health challenges they face, evidence of higher than average return on investment for initiatives that improve the mental health of their workforces, and because of their significant market capitalisation among the S&P/ASX200.

An analysis of current public reporting by companies within these is presented to better inform investors about workplace health issues, and spark a broader conversation about initiatives, implementation strategies, and a suite of possible metrics for measuring and monitoring workplace mental wellbeing.

Company perspectives are also included, where companies were queried about their experiences and initiatives in dealing with workplace mental health - these are marked in breakout boxes and give readers an insight into the type of actions companies may take and results that may be obtained. These perspectives are based on views presented by selected companies and should not be read as independent assessments of their performance on workplace mental health and safety management.

For more information on the sectors and companies examined, see the 'List of Companies' on page 34, and for the research methods see the 'Methodology' section on page 11 of this report.

5.1 Physical and general workplace health and safety reporting and disclosures

This section examines material physical and general workplace health and safety reporting practices of the companies analysed for the study. The disclosure areas under review are:

- Board and senior executive responsibility for health and safety.
- Performance data on physical health and safety and the type of data reported.
- Company disclosures on compensation claims relating to physical injuries.

The physical wellbeing of employees is an important aspect of workplace health. SafeWork Australia tracks compensation claims for serious work-related injuries and illnesses in relation to the prevalence of physical safety risks and impacts on workforces. As shown in Figure 6, in comparison with other industries, finance, insurance and utilities sectors rank lowest in claims for serious injuries. The mining sector, on the other hand, reports a significantly higher number of incidents in the period under review, 2011-2012. From a legislative point of view, Australia's mining sector has made substantial progress in the area of workplace health and safety over the past decade. It is a highly regulated regime comprising specific mining statutes[41], regulations, standards and codes of conduct aimed at ensuring strict adherence to occupational health and safety standards.

Occupational health and safety risks associated with the mining and utilities sectors largely relate to physical, chemical and biological, but also mental hazards; while the risks that affect white collar workers in the finance sector primarily include ergonomic and mental risks.
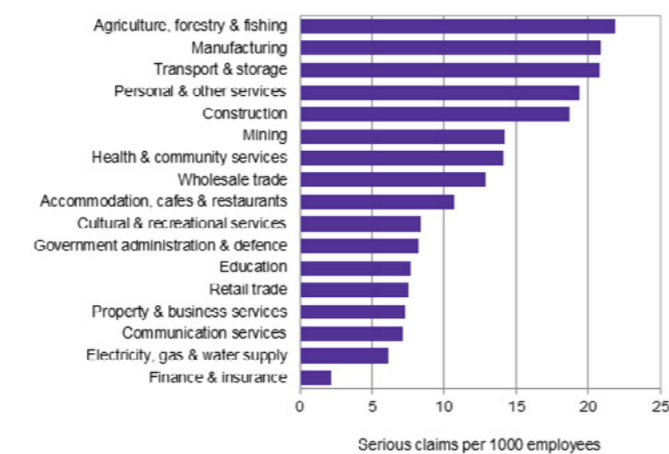
Figure 6 - Serious claims: Incidence Rates by Industry, 2011–12, Source: SafeWork Australia, Key Work Health and Safety Statistics, Australia 2014.

The regulatory framework and potential legal liability of directors means that physical health and safety reporting is well established in Australia.

5.1.1 Board and senior executive responsibility for health and safety

Figure 7 shows that health and safety receives considerable attention at senior executive and board level. Stated board responsibility specifically for health and safety issues is slightly higher for mining and utilities companies (67% of companies disclosed information) than financials (50%). Specific senior executive responsibility is found for 63% of the companies examined across both sector categories.
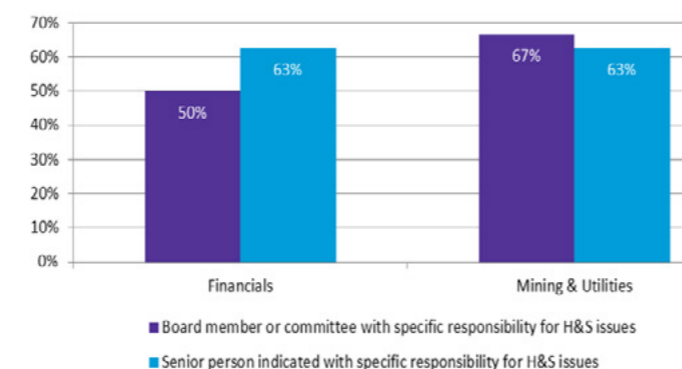
Figure 7 – Percentage of ASX200 Financials and Mining and Utilities companies indicating specific senior and board level responsibility for H&S issues

5.1.2 Performance data on physical health and safety

In sectors with high risk of serious physical injuries, such as mining and utilities, public quantitative safety reporting is very common, with 92% of ASX200 companies in these sectors reporting on safety indicators (see Figure 8).

For the finance sector, which is largely comprised of office-based workforces at lower risk of serious physical injury, more than a third of companies in the ASX200 continue to report quantitative physical injury data. In regard to reporting on qualitative metrics, such as details of safety training approaches, reporting levels are still high. Just over half of financials and 83% of mining and utilities companies provide qualitative reporting.
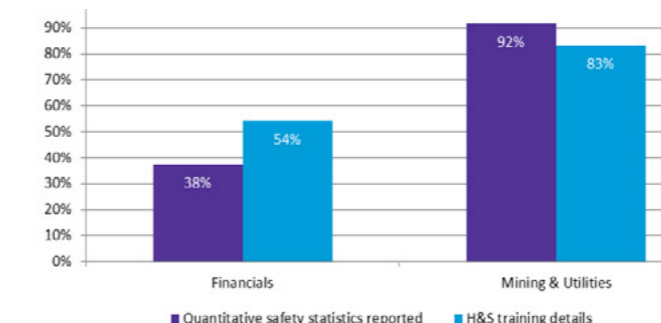
Figure 8 – Percentage of ASX200 Financials and Mining and Utilities companies reporting health and safety quantitative data and training details

5.1.3 Types of information on physical health

The following graphs (Figure 9 and Figure 10) display the type of quantitative physical safety indicators reported by companies in the finance and, mining and utilities sector categories.

The finance sector only discloses one type of physical safety statistic, namely Lost Time Injury Frequency Rate (LTIFR). This is not surprising given the type of work performed in the sector is largely office based with low direct physical injury risk. Despite the comparatively low risk of serious physical injury, around 29% of financials specifically disclose this type of quantitative data. This disclosure is likely linked to best practice sustainability reporting guidelines suggesting that disclosure of injury rates[42], and Lost Time Injury Frequency Rates are the most commonly assessed safety indicators, in line with Australian national reporting by Safe Work Australia[43]. Some financials companies also report quantitative statistics related to absenteeism or sick leave, these disclosures are discussed later in this report (see 'Understanding possible warning signs' on page 25).
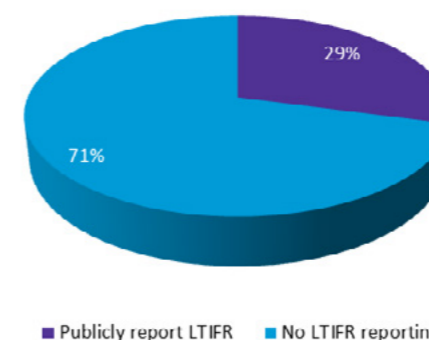
Figure 9 – Percentage of ASX200 Financials companies reporting Quantitative safety performance, Lost Time Injury Frequency Rate

For mining and utilities companies, the disclosure of safety information and the type of data reported is diverse. Companies may disclose one or more types of data, quantitative statistics that are broken down into a range of different indicators, and information categorised by site or region. Lost Time Injury Frequency Rates/Lost Time Injuries, and Total Recordable Injury Frequency Rates / Total Recordable Injuries are the most commonly reported safety indicators, with statistics disclosed by 71% and 50% of companies examined for this report respectively. The majority of companies (83%) report additional safety statistics. Examples of other quantitative safety statistics reported include medical treatment injuries, serious injuries and severity rates.
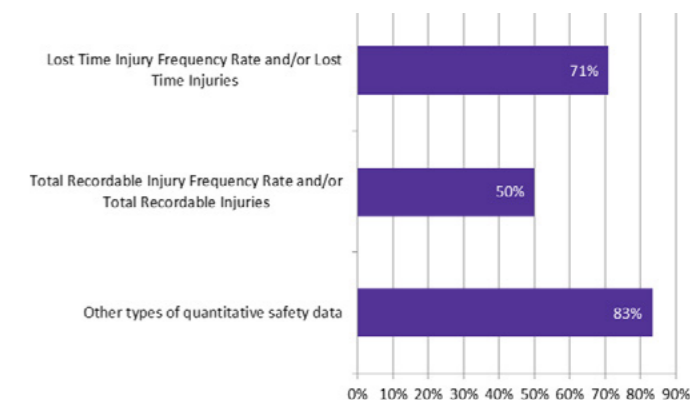
Figure 10 – Percentage of ASX200 Mining and Utilities companies reporting on different types of quantitative safety performance indicators

5.1.4 Compensation claims relating to physical and psychological health

Interestingly only 8% of Financials and 17% of Mining and Utilities companies in the ASX200 disclose information on workers compensation claims (see Figures 11 and 12).

The financial penalties associated with workers compensation claims are often underwritten through insurance. Companies are however subject to operational and reputational risks as a result of the incidents that give rise to compensation claims. Compared to other incurred costs to business, employee absenteeism and presenteeism present stronger financial incentives to address workplace health and safety than compensation claims. This research found that none of the companies reporting on workers compensation provided any public indication of direct psychological health claims.

The low level of reporting of direct psychological claims may be due to low numbers of psychological claims as a result of difficulties in clearly defining psychological injury. Often, the issue cannot be entirely traced back to workplace factors, even if workplaces can in some cases exacerbate symptoms. Where physical and psychological injury occurred simultaneously, or one as a result of the other, it is known anecdotally that claims for psychological assistance and damages can be attached to physical workers compensation claims, and that psychological injury and subsequent claims can persist and continue to compromise a worker's ability long after full physical recovery.

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41   For example, the Mines Safety and Inspection Act 1994 (WA), the Mines Act 1958 (Vic).

42   See for example Global Reporting Initiative G3 Guidelines, Indicator Protocol, LA7, Available at: https://www.globalreporting.org/standards/G3andG3-1/guidelines-online/G3Online/StandardDisclosures/LaborPracticesAndDecentWork/Pages/LA7IndicatorProtocol.aspx

43   Safe Work Australia, Lost Time Injury Frequency Rates (LTIFR), Available at: http://www.safeworkaustralia.gov.au/sites/swa/statistics/ltifr/pages/lost-time-injury-frequency-rates
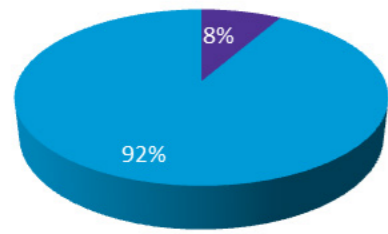
Figure 11 – Percentage of ASX200 Financials companies reporting publicly on workers' compensation claims
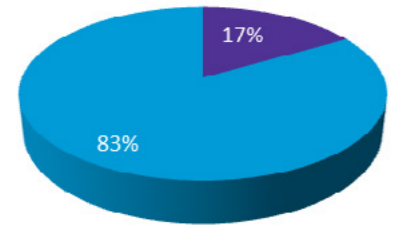

Figure 12 – Percentage of ASX200 Mining and Utilities companies reporting publicly on workers' compensation claims

5.2   Mental health reporting and disclosures

This section examines material mental health reporting practices of the companies in question. The disclosure areas under review are:

- Creation of mental health and safety support networks.
- Workplace culture.
- Understanding possible warning signs of poor mental health and safety.

5.2.1   Creating support networks

Strong leadership support for reducing stigma associated with mental ill health in the workplace is a key recommendation by the Mentally Healthy Workplace Alliance[44]. Investors can play an important role by raising this issue in conversations with the boards and senior executives of the companies in which they invest.

It is difficult to determine specific leadership commitment to mental health without greater insight from companies on how the issue is addressed. While it can be reasonably expected that those in an organisation who have responsibility to oversee workplace related health and safety issues are also responsible for oversight of mental health of the workforce, without a clear leadership conversation on this issue, such a commitment cannot be assumed. An additional challenge is that the responsibilities relating to a strong response may require coordination across multiple functions in a company, for example those in charge of training and development, workplace conduct monitoring, internal and external communications, or community engagement initiatives.

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44   National Mental Health Commission and Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014)

5.2.1.1   Wellbeing initiatives

A starting point to better understand whether employee wellbeing is an issue that is being considered by companies in a meaningful way is to examine whether they report to external stakeholders on wellbeing programs or initiatives. Wellbeing initiatives are an important part of the promotion of mental health that contributes to reducing the stigma of mental illness in workplaces, whilst encouraging active participation in activities that may have a positive impact on a person's wellbeing[45]. The breadth or success of programs are not considered here, but rather a simple measurement of whether they exist among the companies examined for this report.

Figure 13 shows that three quarters of financials and the majority of mining and utilities companies disclose wellbeing programs or initiatives.
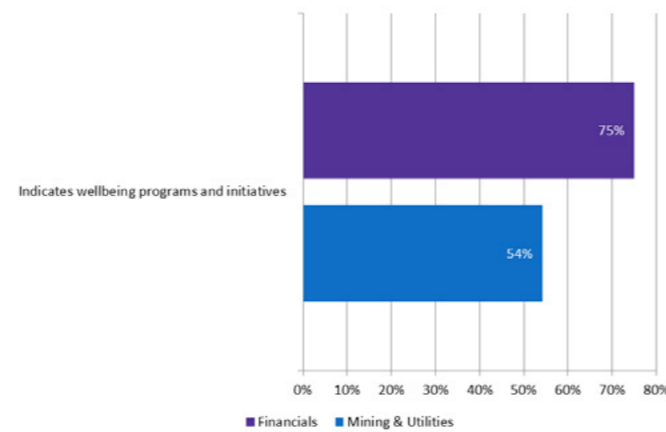

Figure 13 – Percentage of ASX200 Financials and Mining and Utilities companies providing an indication of workplace wellbeing programs and initiatives

Wellbeing programs are one of several possible initiatives disclosed by companies which seek to encourage positive physical and mental health among their workers. These companies encourage a healthier workforce by providing their employees with opportunities to participate in physical activities. Lunch time sport programmes and discounted gym memberships are examples of a physical wellness program. Examples of wellbeing programs disclosed by companies are:

- "Wellness centres" that may include sporting and gym equipment, entertainment devices and swimming pools that are accessible to employees.
- Programs such as company-paid physical health check-ups and company sponsored influenza vaccines.
- Support and communication networks that aim to foster an open workplace that supports mental wellbeing and reduce the stigma associated with mental illness.
- Mental health training programs with the aim of creating a trained support network for employees.
- Resilience training programs with a focus on practical techniques and strategies to assist staff to improve their own personal and workplace performance.
- Workshops that address topics such as nutrition, mental health, parenting, stress and fatigue management, and exercise and fitness.

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45   Ibid.

Company perspective – BHP Billiton

"BHP Billiton recognises the significant impact that poor mental health can have on individuals, their families and their communities. The Company recently developed a management framework for the mental health and wellbeing of its workforce.

We acknowledge that the gender and age characteristics of our workforce align with the cohort at risk of mental health issues in the broader community. We also understand that mental health is multi-dimensional in nature, influenced by a range of biological, environmental and psychological factors.

BHP Billiton is committed to mitigating the risks to mental health that are within our control as an employer, supporting our employees with mental illness and addressing factors impacting on the health and wellbeing of our host communities through our corporate social investment programs. This aligns with our Charter Value of sustainability, which values the health, safety and wellbeing of our employees above all else.

Our company-wide framework centres around four key focus areas:

- *Culture: Actively supporting wellbeing, at all levels of the organisation, and reducing stigma associated with mental ill-health.*
- *Capacity: Enhancing ability to identify and respond to mental ill-health in the workplace.*
- *Prevention: Preventing the onset of mental ill-health through addressing risk factors and developing skills to build resilience and positive mental health.*
- *Recovery: Ensuring workers with mental ill-health have access to resources and are actively supported in their return to work.*

The benefits of a consistent approach have already been demonstrated in our Iron Ore Business. When reviewing existing approaches to mental health, the Iron Ore Business found that while there were many positive initiatives in place already, there was inconsistency across operations. The Business developed a more integrated approach to mental health via a Mental Wellness Standard, which included additional communications through the launch of a dedicated online portal page on mental wellbeing for their employees.

The Business has implemented a range of further initiatives, including:

- *Regular senior leader communications on the importance on mental health.*
- *Training of frontline supervisors.*
- *Better access to support resources, in particular better access to Employee Assistance Program (EAP) providers and efforts to normalise the use of EAPs.*
- *Information sessions for employees and local communities in support of mental health organisations and activities, such as the beyondblue roadshow that visited remote areas and mine sites in the Pilbara.*

An important consideration in the development of BHP Billiton's framework on mental health is that different people receive information in different ways, particularly across different cultures. As a global organisation, our response needs to provide a consistent direction, but allow flexibility to meet varied needs. We will continue to adjust and adapt our mental health program to best meet the differing needs of our employees, and we will benchmark and learn from our peers and from mental health experts. Our annual Employee Perception Survey includes a number of leading indicators on mental wellness. This data, along with data on EAP usage, also helps us improve and refine our management strategies.

Anecdotal evidence is already showing the significant benefits of positive intervention. Since launching their Mental Wellness Standard, the Iron Ore Business has seen an increasing number of employees empowered to step-up, seek support and talk openly about their issues. They have seen a marked increase in employee referrals to site-based health representatives relating to mental wellness issues, and EAP use has increased from 8.7 per cent in 2013 to 10.7 per cent in 2014. This rate is more than double the 4.3 per cent average rate for other mining companies serviced by the same EAP provider.

Through specialist mental health and suicide prevention training, the Iron Ore Business has equipped leaders with the practical skills to prevent, identify and respond to mental health issues in the workplace and create a supportive environment. This increasingly open culture is enabling robust discussions within teams and working groups, helping to raise awareness and erode the stigma associated with mental illness. In addition, hundreds of employees across their sites have attended mental health and wellness seminars. This is providing them with the tools to build resilience, with ongoing site and community-based activities well supported."

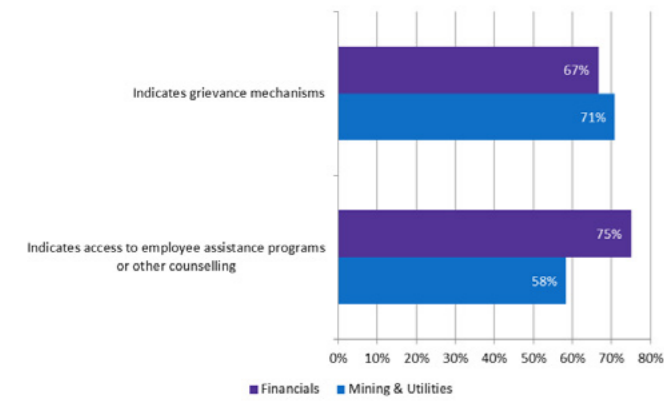### 5.2.1.2 Formal support mechanisms

Figure 14 - Proportion of ASX200 Financials and Mining and Utilities companies indicating formal grievance mechanisms and access to EAPs or other counselling.

Figure 14 shows the proportion of companies with formal support mechanisms such as grievance mechanisms and employee assistance programs.

Workplace relations are an important factor in influencing the wellbeing of employees. For those who experience harassment or bullying, access to independent grievance mechanisms provides an avenue to report and address misconduct by employees. Overall, a significant number of grievance mechanisms are reported: of the financials companies in the ASX200, 67% report that grievance mechanisms are made available to their employees; mining and utilities companies show a slightly higher proportion at 71%. While a significant proportion of companies indicate the existence of grievance mechanisms, there is little known about the utilisation and successful detection of misconduct through grievance mechanisms at company level, based on publicly available information.

For employees experiencing mental ill health, professional support and advice may help them better understand ways to address and manage their mental wellbeing. To assist employees with mental health challenges, companies may engage professional service providers in the form of an employee assistance program (EAP).

This research shows that 75% of ASX200 financials companies have communicated that an EAP is in place at their organisations. 58% of mining and utilities companies within the sample reviewed indicate EAPs. The high uptake of EAPs is encouraging as it indicates that companies are looking for formal processes that help employees impacted by mental illness and wellbeing challenges, although research has found varying evidence of the success of such programs[46].

A Lifeline study of fly-in-fly-out workers and how they access employee assistance programs found that knowledge of the existence of formal assistance programs was inadequate across the workforce, and in qualitative follow up interviews with employees, it was found that those that were aware of EAPs stated a preference for accessing private support networks such as family and friends rather than seeking help through their employer's formal assistance program. It was also found that EAPs vary in quality depending on the external provider of such programs[47].

When reviewing company disclosures on EAPs there is little information on how regularly programs are utilised, or on the quality of EAPs implemented at company level. Ascertaining how successful EAPs are, and how companies track or monitor their usefulness for employees, may provide insight into how rigorously companies are managing worker mental health and wellbeing more broadly.

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46   National Mental Health Commission (2014)

47   Lifeline Western Australia, FIFO/DIDO Mental Health Research Report, (2013), Available at: http://www.lifelinewa.org.au/download/Report%20Executive%20 Summary%20USB.pdf

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Company perspective - Medibank Private

"At Medibank our purpose is 'For Better Health', and as a health business we are conscious that good mental health is a key to overall health and wellbeing. We are fortunate that our involvement externally and the very nature of our services have effectively driven a positive culture internally around the importance of maintaining good mental health for our people in our own workplace.

Medibank has been actively involved for some years in research and programs that support mentally healthy workplaces and mental health awareness in general, including our recent white paper 'Australia's mental health system - can we achieve generational change?'; and our submission to the Review of Mental Health Services and Programs for the National Mental Health Commission in April 2014.

Medibank's Health and Wellbeing (H&W) strategy focuses on four quadrants of health: Physical, Mind, Nutrition and Social Connectedness. Covering the health continuum from well to unwell it creating a holistic program merging the areas of health promotion, community and occupational health and safety.

The strategy delivers a program of work to raise awareness, drive choice based participation and create positive impacts on the H&W of Medibank employees and it is a proof point for the 'For Better Health' purpose for our employees, customers and community alike.

Programs are under the delivered under the MoveBetter, BetterMinds, ConnectBetter and EatBetter. The following are some examples of programs specific to a creating a mentally healthy workforce:

- *Access to Medibank's be.magazine online, an interactive health hub http://www.medibank.com.au/bemagazine/*
- *Mindfulness, resilience and mental health awareness sessions*
- *Employee led workgroups in the key diversity focus areas of gender, culture, accessibility, age, LGBTI, and flexibility, provide opportunities for employees to participate in Diversity programing.*
- *Free fruit daily, casual subsidised gym visits through our GymBetter offering, walking groups, Bike Users Group (MediBUG).*

We also supported beyondblue's "Take 1 step towards mental health" national bus tour in 2014 as the national community partner which aimed to raise awareness about mental health and encourage communities to reach out and seek help. The bus visited Medibank retails stores and corporate offices as it travelled around Australia, giving employees the opportunity to connect with the program and access resources.

Occupational Health early intervention programs:

- *Employee Assistance Program (EAP) and Manager Support;*
- *Integrated HR policies with key resources for people managers and employees; and*
- *Mental Health First Aid courses.*
- *Workplace assessments and Return to Work support for non-work-related injury and illness for both physical and psychological.*
- *EAP – Employee Assistance Program & Manager Support i.e. counselling. Available to employees and their family members*

We also provide critical and targeted risk-based programs which aim to support our own counsellors dealing with traumatic events and conversations including the work we are currently doing for the Royal Commission into the sexual abuse of children in institutions, our call lines for beyondblue and the 1800 RESPECT lines.

We continue to promote EAP programs as a proactive tool rather than just being there when things go wrong. We have driven up utilisation of our employee EAP program and most importantly the use of Manager Support programs had increase some 200% over the past 3 years due to a campaigns and integration of the service into HR procures.

The work environment, employee benefits and partnerships aligned to wellbeing:

- *All full-time and part-time employees are entitled to a 'Good Health Day' in addition to their annual leave;*
- *All full-time and part-time employees are encouraged to volunteer at least one day a year at an organisation of their choice or a not-for-profit that Medibank supports through its community grants program and partner organisation the Stephanie Alexander Kitchen Garden Foundation;*
- *Gift matching each employee donation to any not-for-profit organisation in Australia;*
- *Flexible working arrangements;*
- *Domestic Violence leave as part of special leave entitlements;*
- *Salary continuance and life/Total Permanent Disability (TPD) insurance benefits; and*
- *Subsidised health insurance for eligible employees.*

Employee participation in volunteering has increased fourfold in the last 3 years from 409 hours in 2011/12 to 3030 hours volunteered in 2014/15.

Our Melbourne based head office 'Medibank Place' was designed with activity in mind e.g. sit stand desks, stairs, bike storage, follow your work, standing meeting tables and a multipurpose court. Activity based working (ABW) principles provides an environment that encourages Medibank employees to be physically active throughout the day and more collaborative, innovative and productive. ABW has been translated into all key offices nationally.

In the first weeks of moving to Medibank Place 66% of employees said in a survey they were more productive at Medibank Place; 79% of employees said they were more collaborative with others; 71% said they felt more connected to our 'for better health' purpose working at Medibank Place; 70% of employees said they felt healthier working at Medibank Place with employees walking on average 1400 steps a day or 2.3km a week at Medibank place."

Being involved in work provides an important path to recovery for those impacted by mental illness. Return to work programs that allow for a staged return following illness are often highlighted as an important strategy to re-integrate people with mental health issues, and help with a successful recovery[48]. In reviewing wellbeing and mental health programs and initiatives reported by ASX200 financials,mining and utilities companies, little public discussion was found about the existence and/or development of return to work programs to support employees recovering from mental illness.

5.2.2 Workplace culture

Workplace culture plays an important part in how the psychological wellbeing of employees is recognised and supported. The cultural interface between workplaces that are mentally safe and employees that enjoy better mental health is influenced by multiple factors. In the following sections, information reported by companies that may help to form insights into workplace culture is examined. This information has been framed by a list of indicators as follows:

- Human capital management.
- Flexible workplaces.
- Employee engagement.
- Employee volunteering.
- Training and development.

This is not an exhaustive list. Indicators have been selected to reflect current company reporting and responses that are generally considered to be important determinants of employee wellbeing at the workplace.

5.2.2.1 Human capital management

The human capital management indicator looks at identifying whether companies consider human capital management as part of their overall business strategies.

This study identified that 83% of financials companies (see Figure 15) acknowledge the importance of human capital management in their stated strategy. This is not surprising given the high dependence of financials companies on employees that are skilled, trained to undertake specific tasks that require high levels of corporate knowledge, and are typically not easily replaced.

It is interesting to note that 58% of mining and utilities companies in the ASX200 publicly acknowledge that human capital management is an important part of their business strategy (see Figure 16). This statistic provides a basis for investors to have a conversation with the remaining 42% of mining and utilities companies around how human capital management is viewed when compared to industry peers. Conversations with companies that acknowledge the importance of this indicator can be furthered by acquiring targets and metrics on how human capital management is tracked and monitored.
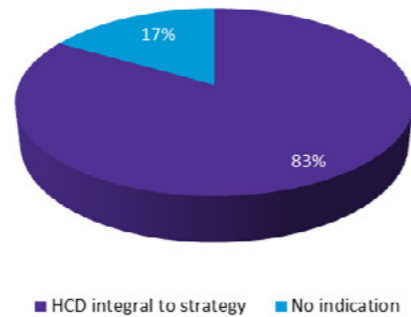

Figure 15 – Percentage of ASX200 Financials companies with public statements on human capital development being integral to corporate strategy
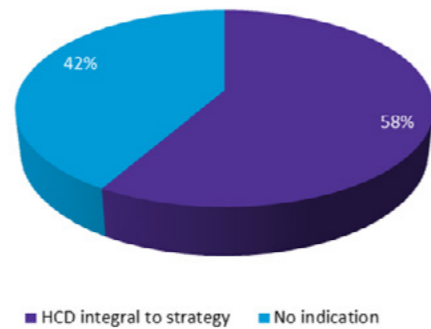

Figure 16 – Percentage of ASX200 Mining and Utilities companies with public statements on human capital development being integral to corporate strategy

5.2.2.2 Flexible workplaces

The flexible workplaces indicator looks at the provision of a work structure that fits business realities while allowing flexibility for individuals to reduce conflicting pressures between private life and workplace demands.

Multiple studies have found that the provision of flexible workplaces has a positive impact on employee wellbeing and job satisfaction. Flexible workplace arrangements allow employees to better balance work and home priorities - contributing to lowering the incidence of work/home conflicts that often result in stress. Such arrangements also allow employees with caring responsibilities to better balance work and private commitments, allowing them to continue to make productive contributions to their workplaces[49].
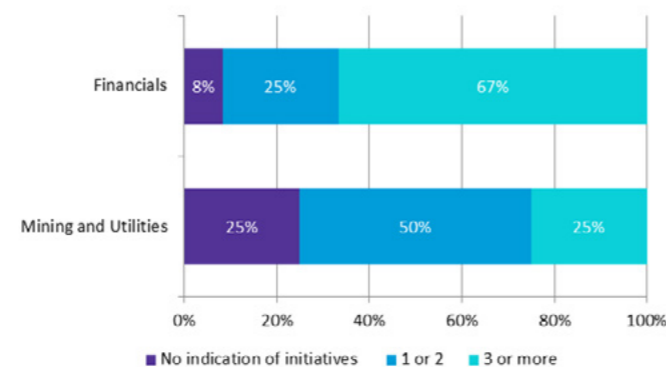

Figure 17 – Percentage of ASX200 Financials and Mining and Utilities companies reporting formal initiatives to enable more flexible workplaces

Figure 17 shows that flexible workplace arrangements are widely reported across the sectors examined for this report.

Two thirds of ASX200 financials companies indicate that they have three or more types of flexible workplace arrangements such as flexible worktime, job sharing, career breaks, parental leave schemes and other family friendly work arrangements. 8% make no clear indication of flexible work arrangements for employees, and 25% indicate one or two types of formal flexible work arrangements. Office-based activities- the predominant mode of work within the finance sector lends itself more easily to flexible workplace initiatives, where working from home or flexible hours to undertake computer-based tasks is easier to arrange and accommodate.

A quarter of ASX200 mining and utilities companies provide no clear indication of flexible work arrangements. Half of the companies within this sector category indicate at least one or two types of flexible work arrangements, and a quarter of the companies disclose details of three or more types of flexible work arrangements. The lower proportion of mining and utilities companies offering flexible workplace arrangements could be connected to onsite job demands within those sectors.

5.2.2.3 Employee engagement

Employees are the obvious place to start for a company seeking to test workplace culture, and whether workers are satisfied with their workplaces. A tool often used by employers to better understand employee satisfaction is regular employee engagement surveys. The research conducted for this report shows that 88% of ASX200 financials companies indicate that they undertake employee engagement surveys, with half of that cohort reporting that they undertake extensive engagement, i.e. in addition to annual employee engagement surveys, companies implement additional formal dialogue with their employees via (for example) intranet systems, internal interviews, or feedback workshops. This is displayed in Figure 18.

For ASX200 mining and utilities companies, more than half of companies (58%) disclose employee engagement, and 29% indicate extensive engagement.
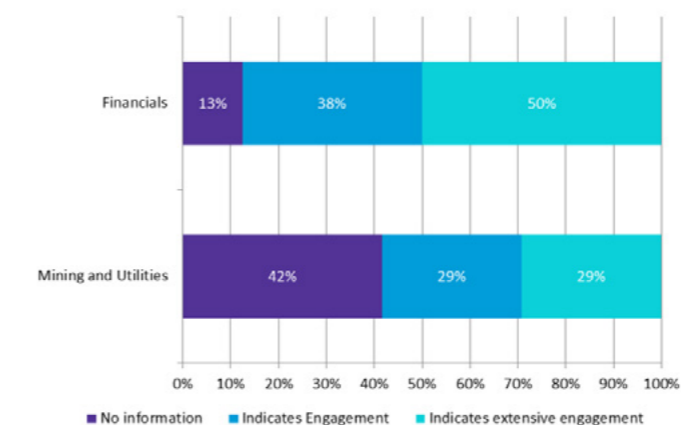

Figure 18 - Proportion of employee engagement by indication of engagement surveys and extensive engagement, ASX200 Financials and Mining and Utilities companies

5.2.2.4 Employee volunteering

Employee volunteering is an employment initiative that is known to contribute to better engagement of employees with their workplace, and enhance employee satisfaction[50].

Companies in the finance sector widely disclose employee volunteering programs, with 83% stating that such programs are in place at their companies (see Figure 19).
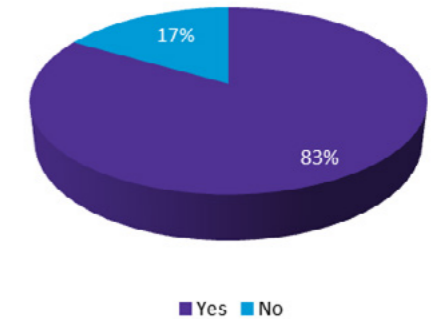

Figure 19 - Proportion of companies with formal employee volunteering opportunities, ASX200 Financials companies

Around 42% of companies in the ASX200 mining and utilities sectors have also indicated that they have formal employee volunteering programs in place (see Figure 20).
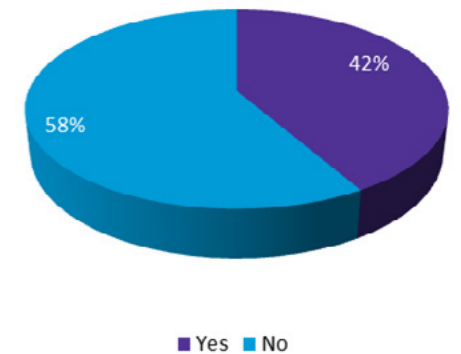

Figure 20 - Proportion of companies with formal employee volunteering opportunities, ASX200 Mining and Utilities companies

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48   National Mental Health Commission and Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014)

49   National Mental Health Commission and Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014)

50   Volunteering Victoria, The Business Case for Corporate Volunteering (2014). Available at: http://volunteeringvictoria.org.au/wp-content/uploads/2013/08/The-Business-Case-for-Corporate-Volunteering.pdf

5.2.2.5 Training and development

Systems of training and development opportunities for employees are important for ensuring employee skills and tasks are continuously reviewed and developed to match the requirements of the business.

The research for this report found that 96% of ASX200 financials indicate they offer training and development opportunities to their staff, although only one third of companies report details of extensive training and development opportunities. Details of extensive training and development opportunities such as a formal leadership program or development reviews above and beyond general training.

A larger proportion of mining and utilities companies examined for this report make no indication of training and development opportunities (29%), and a larger proportion (38%) also indicate extensive training and development opportunities.
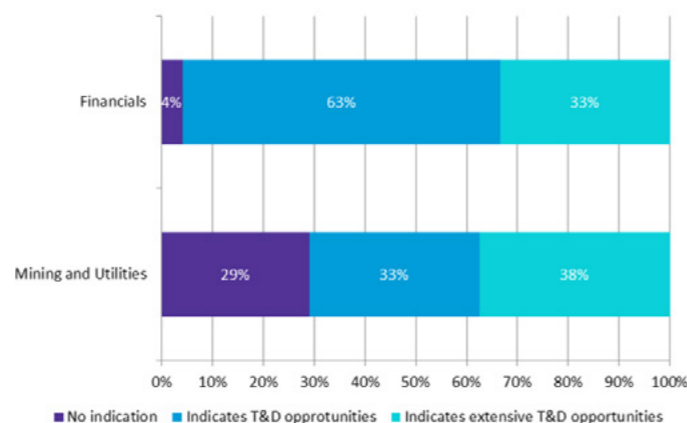

Figure 21 – Percentage of ASX200 Financials and Mining and Utilities companies disclosing varying degrees of training and development opportunities

For those companies that indicate training and development initiatives, but not whether they provide extensive training and development opportunities, investors may consider asking for detail on what training and development opportunities are available to better understand how employees are engaged to match their skill levels to jobs at hand.

An important aspect of employee engagement, training and development opportunities is the provision of formalised training and development reviews. Figure 22 shows that around two thirds of financials companies in the ASX200 indicate formalised training and development reviews, often as part of an annual performance review process between employees and their managers. Half of the mining and utilities companies in this research also indicate formalised development reviews to map out training and career development opportunities for employees.
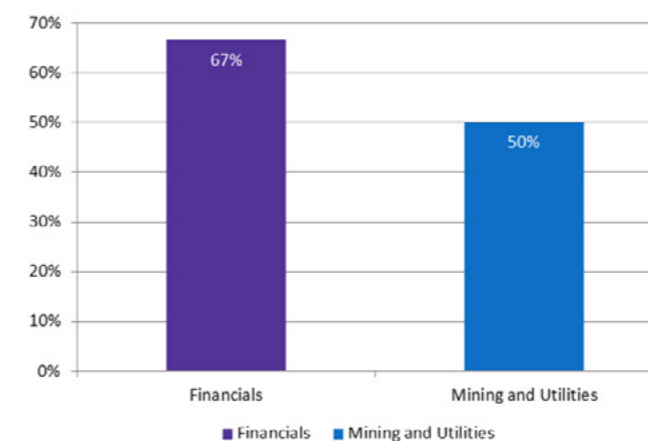

Figure 22 – Percentage of ASX200 Financials and Mining and Utilities companies indicating formalised training and development reviews for employees

5.2.3 Understanding possible warning signs

The proactive, preventative initiatives that companies undertake, if implemented successfully, should positively impact the wellbeing of their workforces.

Research undertaken for this report shows a fairly high prevalence of stated commitments and initiatives that relate to the provision of support networks and systems for a positive workplace culture. However as cited in the introduction to this report, there is extensive research demonstrating a heightened risk profile for companies in the sectors covered – financials, mining and utilities. This suggests that disclosure of policies and initiatives may not provide investors with the full picture.

Metrics for monitoring performance in combination with insight and explanation of the performance may facilitate a more nuanced understanding of the effectiveness of programs and systems in place at a company level. While there are a range of social scientific methods to measure and understand the success of individual initiatives, they may not be practical for all companies and every initiative introduced; in practice monitoring can be difficult, expensive and/or slow to implement[51]. Investors and companies should start a multi-stakeholder conversation on how the success of initiatives can be best measured and supported. It is anticipated that better information sharing between companies, sectors, mental health professionals, academic researchers and investors will result in a refinement of methods for tracking and assessment of appropriate metrics.

It is worth noting that viewing, tracking and changing single risk factors in isolation is unlikely to provide a direct and lasting increase in employee wellbeing. A suite of measures needs to be considered. It is important to avoid being too prescriptive about specific measures since every workplace is different and may require a different approach to effectively manage the wellbeing of their workforce.

For this report, workforce metrics most typically reported by companies were examined to understand how readily available information is. The metrics themselves should not be viewed as an exhaustive list. Companies may already be using a number of other metrics internally that in some cases may be more appropriate to measure and understand workplace mental health and wellbeing than those reported publicly.

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51   National Mental Health Commission and Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014)

Figure 23 summarises disclosures on a number of metrics typically available for those looking at companies through sources such as annual reports, sustainability reports and/or company websites. It shows that the proportion of companies disclosing employee wellbeing related metrics such as staff turnover, results of employee satisfaction surveys, detailed training data, absenteeism rates, or overtime/extra time worked, is considerably lower than stated initiatives (wellbeing initiatives, provision of flexible workplaces, existence of training and development opportunities, etc.) for both financials, and mining and utilities companies in the ASX200.
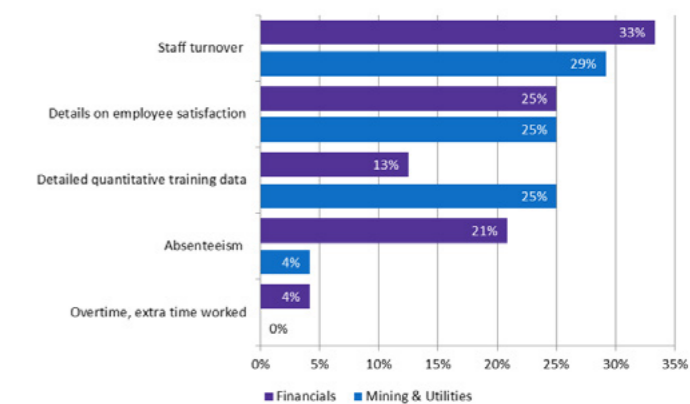

Figure 23 – Percentage of ASX200 Financials and Mining and Utilities companies providing public disclosures of employee and mental health performance indicators

5.2.3.1 Staff turnover

The most commonly reported indicator is staff turnover, with 33% of financials companies and 29% of mining and utilities companies reporting such figures. For this report no distinction was made between companies that report voluntary or absolute turnover figures; however, eleven of the companies examined report voluntary staff turnover rates, which is a better indicator for understanding employee induced turnover as opposed to redundancies due to business restructure or other employee dismissals. Voluntary staff turnover may act as a lagging indicator of poor staff satisfaction and wellbeing.

These rates need to be viewed by external stakeholders with industry and company specific circumstances in mind to start a conversation to encourage attention to staff retention, which if improved are anticipated to reduce the costs associated with staff turnover.

5.2.3.2 Details on employee satisfaction

It was previously outlined that 88% of ASX200 financials companies and 58% of mining and utilities companies report formalised employee engagement, while only 25% of companies in both sector categories report detail on employee satisfaction levels. In all cases the satisfaction levels reported were above 50%.

While this does not necessarily indicate that only the companies that disclose employee satisfaction levels have high satisfaction levels, it does raise the question of whether satisfaction levels are only disclosed if they are high. Do companies avoid disclosure for fear that satisfaction levels might drop over time, and they may attract criticism from external stakeholders? If this is indeed the case, disclosure should be encouraged to enable companies to gain support for the implementation of medium to long-term initiatives that address employee engagement.

5.2.3.3 Detailed quantitative training data

A similar contrast can be observed for training and development. While 96% and 71% of the ASX200 financials, and mining and utilities companies respectively indicate that they have training and development opportunities in place, the disclosure rate of training data is considerably lower. For the financials companies considered in this report: only 13% of companies were found to disclose detailed quantified data on their training activities. For mining and utilities companies 25% of companies researched for this report were found to disclose detailed quantified data on training and development.

5.2.3.4 Presenteeism and absenteeism

Presenteeism and absenteeism are core cost factors for many companies. Mental ill health in the workplace is a significant contributor to both phenomena[52]. To better understand the size of the problem, and the potential gains that can be achieved, both factors should be measured and monitored over time.

The most productive avenue for the measurement of presenteeism to date has been through self-assessment in anonymous employee surveys and the like[53]. It is thus not surprising that research for this report did not find any ASX200 financials or mining and utilities company that reports presenteeism statistics. In contrast, absenteeism or sick days taken are metrics that companies are able to track through their human resources systems. 21% of ASX200 financials companies disclose absenteeism rates. The mining and utilities sectors' very low disclosure rate of absenteeism (4%) might be a function of the view within those sectors that absenteeism poses far less material risk than physical health and safety concerns. For companies for which absenteeism is material, improved disclosure of absenteeism rates will provide valuable information to help investors understand workforce participation rates as part of their risk assessments.

5.2.3.5 Overtime or extra time worked

While stress at low levels can help improve productivity at work, excess workplace stress has been shown to be a driver of mental ill health[54].

Metrics such as average accrued annual leave, overtime or extra time worked can be indicators of excessive workloads and job pressure, and hence workplace stress. Only 4% of companies in the finance sector report on overtime or extra time worked, with none of the companies in the mining and utilities sectors publicly reporting on this metric.

While these metrics may be tracked and discussed internally at management and/or board level, investors looking at public disclosure cannot to date tell what is being tracked. Investors can glean valuable insight by engaging with companies on the outcomes of plans and systems they have in place to manage workplace stress.

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52   Ibid; OECD, Fit Mind, Fit Job: From Evidence to Practice in Mental Health and Work, Mental Health and Work (2015), OECD Publishing, Paris. DOI: http://dx.doi.org/10.1787/9789264228283-en; and PwC (2014)
53   National Mental Health Commission and Mentally Healthy Workplace Alliance, Harvey, S.B, et al. (2014)
54   Ibid.

Company perspective - AGL Energy

"Helping our people to be sustainably engaged in the workforce through good psychological wellbeing is of fundamental importance to AGL. This can be challenged by a number of stressors - most notably the extent of organisational change that may be occurring, and occasions of localised gaps in leadership capability.

AGL tracks the stressors faced by its employees through detailed analysis of its employee engagement survey (which includes questions to evaluate employee stress), exit interviews, grievance reports, attrition rates, unplanned absence rates, injuries and Employee Assistance Program data, along with anecdotal information from our People & Culture business partners.

One metric that AGL tracks in relation to employee wellbeing is the number of stress claims made. This is currently tracking at 13 stress claims per 100 million work hours, which compares favourably with the Australian average of 60. This analysis, combined with literature supporting the connection between employees' psychological states and absenteeism, presenteeism, attrition and workers compensation premiums, as well as reference to HSE legislative obligations, provided a very clear business case to invest in initiatives to reduce the stress faced by employees associated with issues arising in the workplace.

AGL has addressed this challenge through a number of complementary actions:

- *People Centred Implementation training and tools were introduced to ensure the impact on people was considered at the planning and implementation stages of projects.*

- *Resilience training was introduced to allow teams to create common approaches to address adverse situations and feelings.*

- *Promotional campaigns have been launched to raise awareness of mental health and the importance of supporting those that exhibit signs of reduced psychological wellbeing.*

- *Leadership capability training has been consolidated to include development of competencies to create a psychologically healthy work environment (which is supported by flexible work options, purchased leave and reward and recognition schemes).*

- *Broader wellbeing activities that can influence psychological wellbeing, such as physical health programs, and programs designed to improve social interaction.*

The above programs are monitored directly (attendance, satisfaction feedback) as well as by analysing the metrics mentioned above to determine their effectiveness. AGL received positive feedback on the effectiveness of promotions in raising awareness of mental illness. All of the 20 leaders who have participated in training indicated in a post-training survey that it had been effective at equipping leaders to better manage mental health conditions in the workplace. Resilience training has been attended by over 800 AGL employees. The next step in our program is to fully integrate the above approaches into normal business practice at all our sites."

5.3 The FIFO challenge

Stress faced by employees in fly-in fly-out (FIFO) or drive-in drive-out (DIDO) work arrangements has been a focus of the public debate around workplace mental health.

In a traditionally male dominated industry, a recent inquiry into FIFO Mental Health commissioned by the Western Australian Parliament paints a picture of continued stigmatisation of mental ill health, and a 'toughen up princess' attitude[55]. This inquiry commenced as a response to nine alleged FIFO related suicides that occurred over a 12 month period at workplaces in Western Australia in 2013/14.[56]

The Australian Medical Association's (AMA) submission to the Western Australian Parliamentary Inquiry highlights the widespread abuse of drugs and alcohol amongst FIFO workers. The AMA also emphasised the impact of significant demands associated with FIFO work such as being asked to work hard over long days with limited freedom and minimal control over the way in which work is undertaken. According to the submission "the less control over what you do – the greater the stress"[57].

A recent study published by Edith Cowan University in Western Australia has found that FIFO workers suffer from depression at more than twice the rate of the general Australian population. The study also found that FIFO workers exhibited higher rates of stress and anxiety than the general population and non-FIFO mining workers who live in remote and rural areas.[58]

In Western Australia alone, there are an estimated 67,000 FIFO workers. Of the ASX 200 metals and mining companies examined in this report, 79% of the companies are found to have a FIFO workforce for at least one of their mines (see
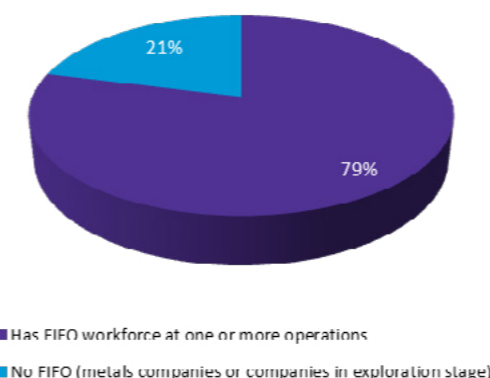

Has FIFO workforce at one or more operations

No FIFO (metals companies or companies in exploration stage)

Figure 24).

Figure 24 - Proportion of ASX 200 Metals and Mining companies with a FIFO workforce

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55   Parliament of Western Australia, Inquiry into mental health impacts of FIFO work arrangements, Available at: http://www.parliament.wa.gov.au /parliament/commit.nsf/ http://www.parliament.wa.gov.au/parliament/commit.nsf/%28InqByName%29/Inquiry+into+mental+ health+impacts+of+FIFO+work +arrangements?opendocument
56   Parliament of Western Australia Education and Health Standing Committee, Shining a Light on FIFO Mental Health - A Discussion Paper, Report No. 4 (27 November 2014), Available at: http://www.parliament.wa.gov.au/Parliament/commit.nsf/ (Report+Lookup+by+Com+ID)/AD292116C942943E48257D9D0009C9E6/$file/ Discussion%20Paper%20Final%20PDF.pdf
57   Australian Medical Association, Submission for the Western Australian Parliamentary Inquiry into Mental Health Impacts of FIFO Work Arrangements (September 2014) p3. Available at: http://www.parliament.wa.gov.au/ parliament/commit.nsf/(Evidence+Lookup+by+Com+ID)/3DB85879F3A1C4 E848257D7F0012E36C/$file/74357601.PDF
58   Vojnovic P, 'Managing Work Related-Suicide of Fly-in/Fly-out Employees' in the Australian Mining Industry, Centre for Innovative Practice, School of Business, Edith Cowan University, (2014). Available at: http://www.anzam.org/wp-content/ uploads/pdf-manager/1671_ANZAM-2014-242.PDF; and Edith Cowan University, 'FIFO depression risk' (11 June 2015). Available at: http://www.ecu.edu.au/news/ media-releases/2015/fifo-depression-risk

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The FIFO workforce model raises the question of whether separation from family and friends makes people with a mental health issue less likely to seek help. Furthermore, the FIFO high compression rosters and associated fatigue that comes with long working hours may also be of detriment to worker mental health.

Family friendly rosters and/or support for FIFO families   **No public reporting**
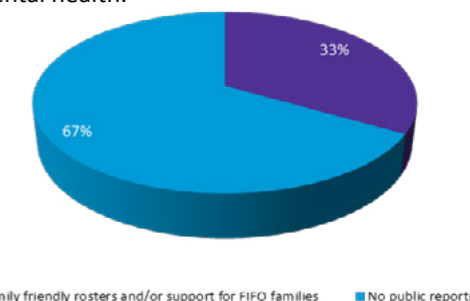
Figure 25 – Percentage of ASX200 Metals and Mining companies with a FIFO workforce providing public disclosures on family friendly rosters and/or support for FIFO families

For this section the report examines whether companies disclose any detail or discussion of management of FIFO related workplace mental health issues through disclosures of either family friendly rosters, or other family friendly support mechanisms in any form. Figure 25 shows that of the companies that have a FIFO workforce, only 33% disclose family friendly rosters and/or initiatives that provide support for FIFO families.

An example of information disclosed includes working rosters where an employee has 8 days on the job then a 6-day rest. This form of rostering allows for more regular contact with family and friends as opposed to typical FIFO rosters which are four weeks on, one week off.[59]

Rosters that facilitate better contact with families and friends at home can reduce feelings of isolation often observed with FIFO workforces, especially towards the end of a long working roster.

Initiatives that provide support for FIFO families include family day trips to FIFO operational sites and family networking sessions. These initiatives allow families to have a deeper understanding of where and how their loved one lives while working on site. The assurance of mobile phone coverage has also been shown to be of prime importance.

Other support initiatives companies implement include:

- EAPs with confidential and anonymous 24/7 telephone counselling service supplemented with face-to-face counselling and mentoring for workers and their immediate families, and/or support and rehabilitation for workers who have drug and/or alcohol problems.

- Chaplaincy programs available at FIFO work sites.

Part of the difficulty of reporting on FIFO workers' wellbeing and support is the lack of data available and the lack of quality research in the field. Better company disclosure on and support for family friendly rosters and FIFO workers and their families would be a positive step for the affected metals and mining companies so as to enhance FIFO worker mental health and wellbeing, and reduce the costs associated with the financial, reputational and legislative fallout of serious mental ill health related incidents.

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59   Construction Forestry Mining Energy Union Queensland, FIFO/DIDO Policy, Available at: http://qld.cfmeu.asn.au/index.php/about-work/fifodido-policy

Company perspective - Independence Group

"The FIFO work environment presents many challenges for both employees and employers and has been the subject of significant attention in the last few years. Independence Group NL (IGO) has certainly faced many of these challenges, with one of our sites having a FIFO workforce and the other site having a predominantly residential workforce. As research further illuminates the potential stressors of FIFO work, we are like many companies continuing to identify and understand what this means for our people.

Home away from home

IGO has understood for some time that working away from home can also be stressful when the environment is impersonal and does not feel like home when you are off duty. We recognise the importance that the standard of accommodation, food and a personal feel of the village in which our employees live plays in ensuring that the employee does not constantly feel like they are "on duty". Our view is that it is important that employees have their own room and "space" so that they can truly have some "down time" and that the food and other facilities allow a level of relaxation and de-stressing. Our Social Club and theme nights are also important in creating this sense of community and providing a level of "fun" that is important to this concept of "down time".

Ease of Communication

IGO also appreciates the challenge our FIFO workers face being away from home when all the little "ordinary" things are happening in the life of their families at home. The ability to communicate each day with their family is very important, making reliable mobile and internet coverage critical for our employees. Real time contact by Skype or phone provides an avenue for this contact and as such we have installed a mobile tower, WIFI and televisions in each room to facilitate the best communication possible for families.

Emergencies

Family emergencies may present further challenges and IGO has developed good relationships with our airline carriers to enable us to move our people off site in emergencies at relatively short notice. We have observed that the increasing rate of caesarean births presents another challenge for FIFO workers and the provision of care for their partners. An extension in the terms of Carers leave and access to leave without pay may be two important planks in future in the kind of support that managers can provide to their employees to "de-stress" significant events like the birth of a baby.

Employee Assistance Programme

Finally, IGO views a well-resourced, easy to access Employee Assistance Programme (EAP) as an important point of confidential contact for our employees and their immediate families. Our EAP has been used as a resource by our employees for personal issues relating to work stress, anxiety and depression, family, children and marriage. In the future our EAP provider may be of assistance in the education programme for applicants and new starters to understand and prepare for the impact of FIFO life."

5.4 International comparisons

This section of the report looks at aggregate scores relating to health and safety disclosures and measures that relate to employee wellbeing disclosures.

Readers should note that the section compares the selected ASX200 companies in the financials, mining and utilities sectors to a selection of companies that are constituents of the FTSE All World Developed index. FTSE All World Developed constituents have a larger proportion of companies with a large market capitalisation when compared to the constituents of the ASX200. The ASX200 has many constituents with medium or small market capitalisation. Nonetheless, this comparison offers insights as to how the ASX200 sectors under review in this research benchmark against global peers, and which global markets might offer a better understanding of possible ways to address issues of workplace health and safety, and employee wellbeing.

The following analysis suggests that companies in the UK and Europe are disclosing information on physical and mental health and safety more comprehensively than international peers. While Australian companies are not fairing the most poorly, there may nonetheless be a case to engage globally, and encourage companies to improve disclosures on these issues.

In North America disclosure practices appear strongly associated with direct risk factors relating to corporate fines and/or litigation. The largest proportion of moderate and good disclosure levels have been found on health and safety related disclosures in the mining and utilities sectors; whereas disclosures in relation to safety measures for financials, and disclosures relating to employee wellbeing, are very low compared to FTSE All World Developed companies in the same sectors across other regions.

5.4.1 Workplace health and safety reporting

Disclosure levels of health and safety were measured as an aggregated score taking into account indicators such as employee training on health and safety, disclosures of safety performance figures, and external verification or certification of systems. Figure 26 benchmarks financials companies in the ASX200 with similar companies in other regions.
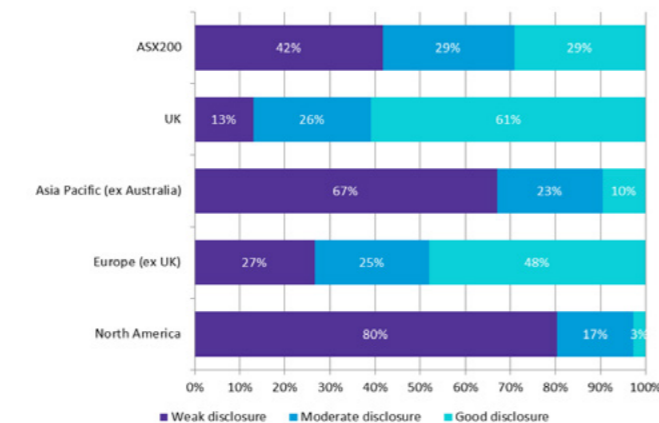

Figure 26 - International comparison by region, aggregated assessment of H&S disclosures, Percentages of FTSE All-World-Developed by region and ASX200 Financials companies

The benchmarking of the ASX200 mining and utilities companies, shown in Figure 27, demonstrates that a large proportion of companies in each region have moderate and good disclosures. In particular, mining and utilities companies in Europe and the UK show strong health and safety disclosures.
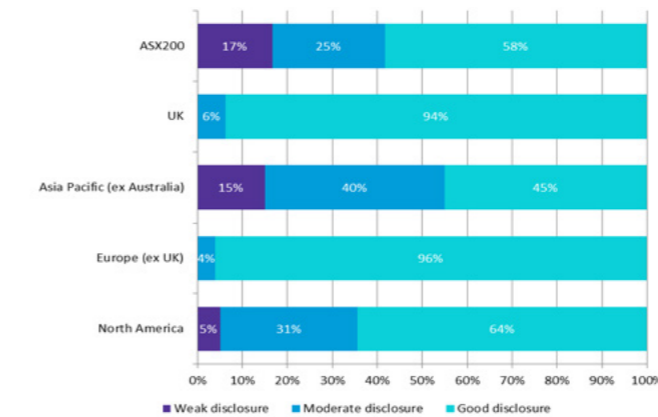

Figure 27 - International comparison, aggregated assessment of H&S disclosures, Percentages of FTSE All-World-Developed by region and ASX200 Mining and Utilities companies

5.4.2 Employee mental wellbeing related reporting

The mental wellbeing indicator assesses three different criteria areas in order to establish a grade of weak, moderate or good disclosure:

- The presence of systems that encourage stakeholder engagement, such as company surveys and social audits of reports[60].
- Systems that ensure employment security and job creation.
- Initiatives and policies that relate to professional training and development.

While Australian financials, mining and utilities companies in the ASX200 are not leaders in the disclosure of details on areas that relate to the mental wellbeing of employees, they are not the least comprehensive of the international cohort. North American companies have the weakest disclosures among international peers (see Figures 28 and 29).
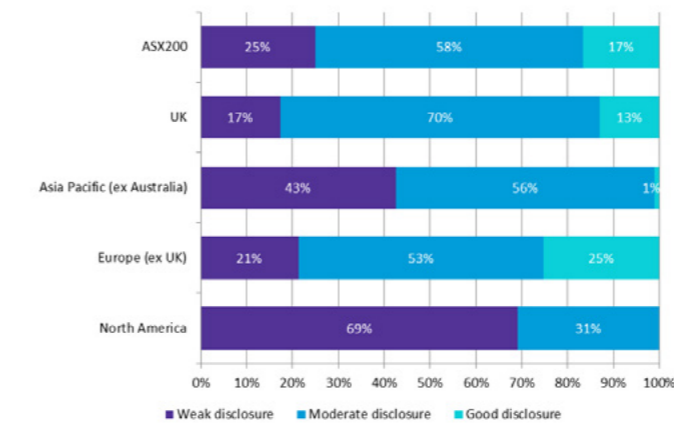

Figure 28 - International comparison by region, mental wellbeing disclosures, Percentages of FTSE All-World-Developed by region and ASX200 Financials companies

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60 While the stakeholder reporting score considers engagement with both internal and external stakeholders, it is deemed an appropriate cross-regional proxy for engagement of the company with its employees, employee engagement being a factor in the overall score.

In the finance sector and the mining and utilities sector category, Europe (excluding the United Kingdom) have the highest percentage of companies with good disclosure for mental wellbeing.

The United Kingdom has the lowest percentage of financials, mining and utilities companies with weak disclosure in regards to the mental wellbeing indicator (see Figure 28 and 29).

The Australian finance sector has the second highest percentage of good disclosure with 17% of companies analysed receiving a good disclosure score, falling behind Europe (25%) (see Figure 28). The Australian mining and utilities sectors also have the second highest percentage of good disclosure with 8% of companies receiving a good disclosure score, again falling behind Europe (31%)(see Figure 29).

North American financials, mining and utilities companies have the weakest disclosure of mental wellbeing in the international comparison. 69% of North American companies in the finance sector have weak disclosure and 59% of North American companies in the mining and utilities sector category have weak disclosure of mental wellbeing indicators.
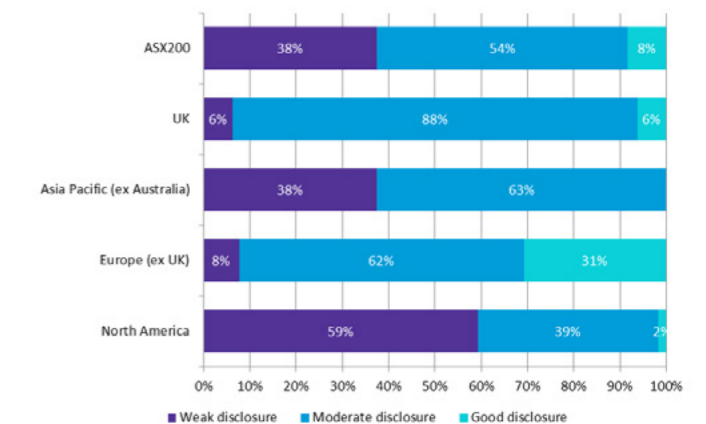

Figure 29 - International comparison, mental wellbeing disclosures, Percentages of FTSE All-World-Developed by region and ASX200 Mining and Utilities companies

6. Conclusion and recommendations

Investors are well placed to expand the conversation with companies on workplace mental health. It is in the best interests of the investor community that companies effectively manage the mental wellbeing of their workforces. Companies with mentally healthy workforces are safer, more productive, enjoy stronger employee engagement and have workers who are more resilient in times of change. Given the prevalence of mental illness, it is also in the best interests of long-term investors to work within an economy that has an inclusive approach to workforces, one that does not stigmatise mental ill health.

The research undertaken for this report shows that a significant proportion of S&P/ASX200 (ASX200) financials, mining and utilities companies disclose a commitment to implementing workplace initiatives such as wellbeing programs, flexible workplaces, training and development, tracking employee satisfaction and engagement through engagement surveys and provision of volunteering programs. Many companies also report formalised grievance mechanisms and employee assistance programs (EAPs) to provide support to employees who experience bullying, harassment, stress, or forms of mental illness.

While there is a high level of commitment across a range of workplace issues, to date there is little information on the success of the initiatives implemented. Only a small proportion of companies disclose qualitative or quantitative information on issues such as utilisation of employee assistance programs, employee satisfaction levels, staff turnover rates, training data, absenteeism, or overtime worked. This stands in stark contrast to the observed very high disclosure rates for physical health and safety, in particular for the mining and utilities companies in the ASX200.

Investors with an ESG (environmental, social and governance) engagement program are in a strong position to encourage company directors and senior managers to make mental health a priority and demonstrate leadership on the issue. The company perspectives in the report highlight the need to monitor and track the progress of initiatives, and continuously review the successes of the strategies utilised.

An issue that has drawn public attention but is not yet widely reflected in public company disclosures are the challenges many ASX200 mining companies face around their FIFO workforce. While a third of mining companies are disclosing at least some information on initiatives to improve the mental wellbeing of their workforces, any efforts these companies are putting in to reduce stigma around mental health issues are still unclear. As such, there is significant scope for investors to engage with companies in support of the implementation of meaningful initiatives and the creation of favourable long and short term investment outcomes. After all, the return on investment for improving the mental health of workforces, especially in the mining industry, can be as high as $15 per dollar spent[61].

Key actions for investors

Please note that this is not an exhaustive list, but rather a summary of the suggestions raised in the body of this report to expand the conversation on workplace mental health and safety:

- Engage the boards and senior executives of companies invested in to raise awareness of and improve disclosures on workplace mental health and safety.

- Raise the issue of leadership support for de-stigmatisation of mental illness in conversations with the boards and senior executives of the companies in which you invest.

- Engage with companies that disclose poorly on human capital management when compared to industry peers around how human capital management is viewed and where it sits within business strategy.

- Ask for detail on what training and development opportunities are available to better understand how workforces are engaged to match their skill levels to the work conducted.

- Start a multi-stakeholder conversation on how the progress of initiatives for workforce mental health and wellbeing can be best measured and supported.

- Request absenteeism rates, details on employee satisfaction metrics and performance and targets over time.

- Engage with relevant companies on the outcomes of plans and systems in place to manage workplace stress.

Appendices

Appendix A: Methodology supplement

The following is the list of factors considered and method by which aggregate scores were assigned to companies for this report.

Physical health and safety practices transparency:

Aggregated assessment of disclosure practices is based on one of three possible grades: good disclosure, moderate disclosure, weak disclosure; considering a combination of the following factors:

- Senior responsibility for health and safety issues.

- External safety awards or external accreditation of safety systems.

- Details of health and safety training to employees.

- Public reporting of health and safety data.

Mental health indicators

A number of broader human capital development related indicators were used as proxies to identify companies showing a more proactive approach to employee and workplace related issues through their reporting and sustainability communications. An aggregate score was taken to compare Australian and international companies:

Stakeholder engagement

- Surveys of stakeholders (includes employees, customers, suppliers, communities).

- Social audits or reports for stakeholders.

- Coverage, frequency and independent verification of social audits.

- Conducts audits, has surveys or committees to undertake engagement.

Employment Security and Job Creation

Grading a combination of the following factors:

- Disclosures on policies around restructuring and redundancies.

- Proportion of staff on temporary contracts.

- Organic job creation.

- Senior responsibility.

Training and Development

Grading a combination of the following factors:

- Senior responsibility for training and employee development.

- Training and development reviews.

- Detailed quantitative data on training.

Aggregation of scores for mental health reporting:

	Stakeholder engagement	Employment Security and Job Creation	Training and Development	Aggregate score
Weak disclosure	1	1	1	3 (lowest possible)
Moderate disclosure	2	2	2	6 (average)
Good disclosure	3	3	3	9 (highest possible)

Total score of 3, 4 or 5 = Weak disclosure I Total score 5, 6 or 7 = Moderate disclosure
Total score of 8 or 9 = Good disclosure

Appendix B: Tools and resources

These lists are grouped by types of resources, and then presented in alphabetical order. This is not intended to be an exhaustive list of resources, but may help those seeking further guidance and contact points.

Immediate Support

Organisation	Description	Contact
Lifeline	Lifeline is a crisis support and suicide prevention service.	https://www.lifeline.org.au/ Call 13 11 14
Suicide Call Back Service	The SCBS is a 24 hour nationwide service that provides telephone and online counselling to people 15 years and older who are suicidal, caring for someone who is suicidal or bereaved by suicide.	https://www.suicidecallbackservice.org.au/ Call 13 11 14

Initiatives

Organisation	Description	Contact
Act Belong Commit	A mental health promotion campaign that encourages individuals to take action to protect and promote their own mental wellbeing.	http://www.actbelongcommit.org.au/news/act-belong-commit.html
Go home on time day	An initiative organised by The Australia Institute to start a conversation about the impact of poor work/life balance on our health, relationships and workplaces.	http://www.gohomeontimeday.org.au/
RUOK? Day	An annual day to encourage and equip everyone to regularly and meaningfully ask "are you ok?" with the notion that a conversation could change a life.	https://www.ruok.org.au/

Practical Guidance and Tools

Organisation	Description	Contact
Australian Indigenous HealthInfoNet	Provides resources on social and emotional wellbeing (including mental health) with a particular focus on Indigenous communities.	http://www.healthinfonet.ecu.edu.au/other-health-conditions/mental-health/resources/practice-resources/toolkits
Heads Up (Mentally Healthy Workplace Alliance)	An initiative to provide individuals and businesses free tools and resources to take action to create mentally healthy workplaces.	http://www.headsup.org.au/
Human Rights Commission Guide for employers	Provides information for managers on how to appropriately support workers with mental illness.	http://www.humanrights.gov.au/our-work/disability-rights/publications/2010-workers-mental-illness-practical-guide-managers
JobAccess	An Australian Government Initiative to provide information and an advisory service for employers relating to employing people with disability. The service also offers financial assistance to employers to make adjustments that support people with mental and physical health conditions.	http://www.jobaccess.gov.au/
Mental Health First Aid	Mental Health First Aid is a national not-for profit organisation focused on mental health training and research. The organisation delivers a variety of training programs and courses.	https://mhfa.com.au/cms/home
People at Work Project	Research collaboration aimed at understanding how workplace characteristics influence employee health and wellbeing in different industries and occupations. The project provides organisations with the resources to better manage mental hazards in the workplace.	http://www.peopleatworkproject.com.au
This FIFO life	A website that provides an extensive, searchable online directory of mental health services of people who commute long distances for work and their families. The website was funded by the Western Australian Mental Health Commission.	http://thisfifolife.com/

Support Networks and Research Organisations

Organisation	Description	Contact
Beyond Blue	An independent not-for-profit organisation that works to increase awareness and understanding of anxiety and depression in Australia and to reduce the associated stigma	http://www.beyondblue.org.au/
The Black Dog Institute	A not-for-profit organisation that looks at the diagnosis, treatment and prevention of mood disorders such as depression and bipolar disorder.	http://www.blackdoginstitute.org.au/
Mental Health Australia	A non-government organisation representing and promoting the interests of the Australian mental health sector	http://mhaustralia.org/

Appendix C: List of companies examined in this report

Company Name	GICS Sector	GICS Industry Group	GICS Industry
AGL Energy Limited	Utilities	Utilities	Gas Utilities
Alumina Limited	Materials	Materials	Metals and Mining
AMP Limited	Financials	Insurance	Insurance
APA Group	Utilities	Utilities	Gas Utilities
Arrium Limited	Materials	Materials	Metals and Mining Mining
ASX Limited	Financials	Diversified Financials	Diversified Financial Services
AusNet Services	Utilities	Utilities	Multi-Utilities
Australia And New Zealand Banking Group Limited	Financials	Banks	Banks
Bank of Queensland Limited	Financials	Banks	Banks
Bendigo and Adelaide Bank Limited	Financials	Banks	Banks
BHP Billiton Limited	Materials	Materials	Metals and Mining Mining
Bluescope Steel Limited	Materials	Materials	Metals and Mining Mining
Challenger Limited	Financials	Diversified Financials	Diversified Financial Services
Commonwealth Bank Of Australia	Financials	Banks	Banks
Cover-More Group Limited	Financials	Insurance	Insurance
DUET Group	Utilities	Utilities	Multi-Utilities
Evolution Mining Limited	Materials	Materials	Metals and Mining Mining
Flexigroup Limited	Financials	Diversified Financials	Diversified Financial Services
Fortescue Metals Group Limited	Materials	Materials	Metals and Mining Mining
Genworth Mortgage Insurance Australia Limited	Financials	Banks	Thrifts & Mortgage Finance
Henderson Group PLC	Financials	Diversified Financials	Capital Markets
Iluka Resources Limited	Materials	Materials	Metals and Mining Mining
Independence Group NL	Materials	Materials	Metals and Mining Mining
Insurance Australia Group Limited	Financials	Insurance	Insurance
IOOF Holdings Limited	Financials	Diversified Financials	Diversified Financial Services
Macquarie Group Limited	Financials	Diversified Financials	Diversified Financial Services
Magellan Financial Group Limited	Financials	Diversified Financials	Diversified Financial Services
Medibank Private Limited	Financials	Insurance	Insurance
National Australia Bank Limited	Financials	Banks	Banks
Newcrest Mining Limited	Materials	Materials	Metals and Mining Mining
Northern Star Resources Limited	Materials	Materials	Metals and Mining Mining
OZ Minerals Limited	Materials	Materials	Metals and Mining Mining
OzForex Group Limited	Financials	Diversified Financials	Consumer Finance
PanAust Limited	Materials	Materials	Metals and Mining Mining
Perpetual Limited	Financials	Diversified Financials	Diversified Financial Services
Platinum Asset Management Limited	Financials	Diversified Financials	Capital Markets
QBE Insurance Group Limited	Financials	Insurance	Insurance
Regis Resources Limited	Materials	Materials	Metals and Mining Mining
Rio Tinto Limited	Materials	Materials	Metals and Mining Mining
Sandfire Resources NL	Materials	Materials	Metals and Mining Mining
Sims Metal Management Limited	Materials	Materials	Metals and Mining Mining
Sirius Resources NL	Materials	Materials	Metals and Mining Mining
Spark Infrastructure Group	Utilities	Utilities	Multi-Utilities
Steadfast Group	Financials	Insurance	Insurance
Suncorp Group Limited	Financials	Insurance	Insurance
Syrah Resources Limited	Materials	Materials	Metals and Mining Mining
Western Areas Limited	Materials	Materials	Metals and Mining Mining
Westpac Banking Corporation	Financials	Banks	Banks

Appendix D: Table of Figures

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