

Scottish Hazards

**Scottish Hazards Response to the
Engagement Paper on Themes and draft
Actions for possible inclusion in the
Scottish Government's new Suicide
Prevention Action Plan**

April 2018



Introduction

Scottish Hazards is a registered charity promoting higher standards of health and safety in Scottish workplaces. We work with trade unions, the Scottish Centre for Healthy Working Lives, the Scottish Government and other health and safety organisations to ensure workers are protected from occupational injury, disease or ill health and we are an active participant in the Partnership for Health and Safety in Scotland.

We also work with Families Against Corporate Killers, an organisation formed by members who have lost loved ones because of injuries received at work and firmly believe that far more needs to be done to ensure victims' families receive effective justice and those culpable for their losses are held to account.

Injuries at work go beyond physical harm and disease related to work and psychological harm caused by employment have become more prevalent in the late nineties and the early part of this century. The TUCs biennial survey of union health and safety representatives¹ has gradually seen physical symptoms such as musculoskeletal disorders (MSDs) replaced as the key concern of reps replaced by psychosocial conditions such as work-related stress and bullying and harassment.

Scottish Hazards is concerned this trend shows no sign of abating and we are creating workplaces, jobs roles and employment conditions that contribute to mental and financial insecurity and if not addressed serious mental health conditions and low self-esteem that can impact on an individual's perception of their own self, sometimes with tragic consequences.

As a charity whose main objective is improving the health and safety protections afforded to Scottish Workers our response will focus on the workplace and potential actions and work required to reduce incidences of work related suicide, suicides mainly ignored by employers, the Health and Safety Executive and until comparatively recently trade unions.

Thankfully, trade unions are now highlighting work related suicide as a workplace issue and equipping reps on how to support members in a suicidal state as well as creating workplaces where the conditions that may led to suicide are identified and challenged as part of the collective bargaining agenda, fitting in with the Scottish Government's commitment to fair work.

Scottish Hazards welcomes the opportunity to contribute to the this work and would like to make the following comments.

Questions

1a) Do you agree that we should establish a “knowledge into action” group for suicide prevention? (Tick one only)

Yes

No

Don't know

1b) Please explain your answer.

Scottish Hazards would support the establishment of such a group if the terms of reference included examination of work, workplaces and working conditions and membership included organisations with direct links to the workforce such as trade unions and our own organisation.

Workplace suicide prevention strategies should be developed having given consideration to the Fair Work Framework and its individual dimensions, effective voice, opportunity, security, fulfilment and respect. Scottish hazards would like to link the new strategy and fair work as there is clear crossover between tackling suicide directly related to work or where work may have contributed to suicide and ensuring Scotland's economy is driven by fair work. Where workplace health inequalities are challenged, workers are less likely to be exposed to precarious insecure employment, but instead, have more fulfilling jobs and access to learning and development that provides improved personal skills and the opportunity to move out of bad work and in work poverty to more secure and fulfilling roles.

In March 2017, the Samaritans published the report *Dying from Inequality*ⁱⁱ, which concluded that job insecurity, zero hour contracts and workplace downsizing are important risk factors in suicide. It argued that employment protection regulations and procedures that “restrict the freedom of companies to hire and dismiss workers” would significantly reduce suicide risk. We recognise that these are matters currently reserved to Westminster. But there are areas in respect of which the Scottish Parliament can take action. The link between work and suicide is all too often neglected and Scottish Hazards would like to see this addressed in the refreshed strategy, although from examination of the consultation document this would not appear to have been considered. And this is despite the fact the Scotsid report published in 2017 statesⁱⁱⁱ: “Effective suicide prevention action is required to raise employers’ awareness of work-related threats to mental health and to promote positive mental health in the workplace. There is good evidence that improved occupational health in the workplace can reduce sickness absence,

recognise mental illness earlier, and perhaps address some of the factors that may increase suicide risk.”

We recognise that organisations such as Choose Life and See Me engage with employers and through them to the workforce but using employee voice to develop workplace suicide prevention strategies should not be purely employer driven.

Therefore, we see it is imperative that workers’ representatives would be on this body to ensure the experiences of those supporting workers displaying suicidal behaviours or who have lost loved ones through suicide are shared to help others.

1c) Please provide any additional comments or suggestions about improving the use of evidence, data and/or guidance on suicide prevention.

The Scotsid report published in 2017 states^{iv}: “The ScotSID findings serve as a timely reminder that, in addition to targeting those who are unemployed as an important risk group, suicide prevention efforts need to focus attention on the workplace: while unemployed people are over-represented in the ScotSID cohort, the majority of the cohort is employed at the time of death.” However, not enough information is provided to ascertain the last known occupation other than the Standard Industrial Classification Code. Scottish Hazards would suggest that more analysis of evidence in this area is required to establish any link between suicides and the individual’s *genuine* employment status.

Furthermore the HSE’s position on suicide investigation is at best unhelpful, at worst uncaring regarding suicide as a work-related issue. Their incident selection criteria^v regarding deaths in the workplace excludes investigation of suicides in the work environment where the approach taken is the same for deaths by natural causes.

Strangely, they accept that in some sectors such as health and social care, the risk of suicide may be related to work activity and, as such, potentially open to investigation under Section 3 of the Health and Safety at Work Act 1974 by HSE or local authority environmental health officers.

Scottish Hazards disagrees with this distinction and our view is that all suicides where there is evidence they are directly related to work or where there are reasonable grounds to suggest work played a significant part in the decision should be investigated by our health and safety enforcement bodies. To give one previous example where a family were convinced their loved one’s death was work-related^{vi}, but were denied even a fatal accident enquiry as the Crown Office felt it was not in the public interest to do so. Scottish Hazards rejects the Crown

Office position on the case of 53 year old BT, worker Jim Kirk and we believe it is entirely in the public interest to hold fatal accident inquiries where there is some evidence to connect the suicide to work.

Investigations into deaths at work hopefully inform future preventative actions by developing evidence to shape public policy in this area. More substantial evidence could be developed if suicides relate to work were investigated and robust preventative measure put in place, where required, based on that evidence.

Scottish Hazards recognises health and safety enforcement is a reserved matter but that does not prevent a Scottish Parliament Committee holding an inquiry into work related suicides to inform any new Suicide Action Plan.

By way of international comparison, a recent article in Hazards Magazine^{vii} reveals that one in every five employee suicides reported to the Sécurité Sociale authority in France is recognised officially as being work-related. There is no mechanism for collecting data on work-related suicide. In France, where an employee takes his or her own life in the workplace, it is immediately investigated as a work-related suicide and the burden of proof is on the employer to demonstrate that the suicide was not work-related. Even if a suicide takes place outside of work, it is still considered as work-related if there is a connection with work – a suicide letter, a work uniform or use of a work implement.

Scottish Hazards would also urge the Scottish Government to consider the work done by Suicide Prevention Australia and their 2014 report Work and Suicide Prevention, a position paper^{viii} as the starting point for similar work in Scotland. This work highlights many of the workplace issues that we believe need to be addressed in relation to workplace suicide prevention and many of these fit with the fair work dimension, if we can increase the support for developing an economy based on fair work by 2025 then the number of workers exposed to mentally unhealthy workplaces and risk of mental ill health should fall.

2a) Do you agree that we should develop a new mental health and suicide prevention training programme? (Tick one only)

Yes

No

Don't know

2b) Please explain your answer

Scottish Hazards would support the development of a new mental health and suicide training programme but only if this was fully inclusive and involved all necessary stakeholders, including trade unions, in its development.

While we recognise some of the ground-breaking work that Scottish Governments, present and past have done to prevent suicide and stigmatisation of poor mental health, developing ground breaking initiatives such as Choose Life and See Me, more needs to be done to work with organisations that understand the work environment and the workplace policies that lead to work-related mental ill health. That should include a greater role for trade unions, potentially involving Scottish Union Learning and organisations like ours in developing much needed workplace elements of a new mental health and suicide prevention programme.

Voluntary sector organisations working in the area of mental health may be well placed to understand the implications of good and bad work on individuals' mental health, but we feel there are organisations better placed to challenge employers and assess the impact an employer's own policies and actions have on workers' mental health.

More use should be made of the extensive knowledge trade unions have of the workplace, the knowledge they are developing, the support they are giving to representatives on suicide as well as their experience in delivering workplace based learning through Scottish Union Learning.

2c) To what extent do you agree that there should be *mandatory* suicide prevention training for specific professional groups? (Tick one only)

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

2d) Please explain your answer.

Scottish Hazards would support mandatory training if this was extended to include workplace decision makers in public, private and third sector organisations, those responsible for creating work environments that have detrimental impacts on workers mental health and wellbeing, this should include senior managers and HR personnel. We are not sure how that could be done under the current devolved powers but influencing changes in behaviour in supply chain companies by asking for evidence in public procurement processes of suicide prevention training having been undertaken by relevant people may be an option fitting with the concept of fair work.

2e) Please provide any additional comments or suggestions about modernising the content and/or accessibility of training on mental health and suicide prevention.

Scottish Hazards feels that, in addition to the groups identified in the engagement paper, trade union stewards, health and safety and equality reps should also be included as an essential cohort for training. These reps are already highly specialized in their own areas of expertise but could possibly benefit from tailored suicide awareness raising or specific intervention-based training based on the reps' skills, competencies and roles within their union.

Many trade union members in public, private and third sector employment have seen employment security slashed and the prospect of short term or zero-hour contracts and having other changes to terms and conditions imposed on them. These are only a few areas of emerging precarious employment relationships that Scottish Hazards feel will have an impact on the mental health and financial security of workers and their families.

The TUC has produced a guide on work and suicide^{ix} aimed at providing reps with the skills required to identify trade union members and colleagues with poor mental health, to support them in the workplace and hopefully help to prevent them completing suicide.

Hazards Magazine has also published a number of articles on work related suicide, most recently in its February edition^x including a checklist for reps to identify and challenge workplace issues and policies that have such an adverse effect on workers' mental health they choose to take their own lives.

The GMB trade union^{xi} has expanded on the TUC guidelines in their GMB@Work Guide; Work and Suicide, including in their guidance advice from other organisations such as the Samaritans and Business in the Community, the emphasis on this guidance and that published by the TUC is on ensuring reps have the necessary skills to provide initial support to members contemplating suicide, including those in imminent danger, but also to recognise their limitations and where to signpost members with suicidal thoughts to the necessary professional healthcare services.

However, most workers, particularly in the private and third sector are not in trade unions and do not have access to this support and intervention, Scottish Hazards is looking at how trade unions and public-sector employers could work with our organisation to provide health and safety training, including potentially on suicide prevention and interventions, to private sector supply chain companies or service providers.

3a) Do you agree that we should establish a Suicide Prevention Confederation?

(Tick
one only)

Yes

No

Don't know

3b) Please explain your answer.

Scottish Hazards would neither support or disagree with this proposal as the consultation as it stands would appear to exclude the involvement of trade unions, a crucial omission for our organisation.

For all the reasons outlined elsewhere in this response trade unions and to, a lesser extent organisations like ours seeking to influence change in consultation with, and for the betterment of workers should be included in any workplace suicide prevention strategies. Trade unions develop and negotiate workplace policies on matters such as mental health and wellbeing and it would appear strange, given the trade unions involvement in developing the fair work agenda, they would be excluded from any suicide prevention confederation.

Such a confederation would require to be adequately funded to allow organisations to commit to any workplan activity and Scottish Hazards would argue that in order to be part of any confederation an organisation (public, private or third sector) should have to demonstrate a commitment to all the dimensions of fair work and provide evidence from their workforce that, as an employer, they provide effective voice, opportunity, security, respect and fulfilling work for all their workers

3c) Where do you think *local* leadership for suicide prevention is best located?

(Tick
one only)

Local Authorities

Health & Social Care Partnerships

Community Planning Partnerships

Third Sector

Other arrangement – please specify _____

Don't know

3d) Please explain your answer.

Again, Scottish Hazards has difficulty in picking just one of these, but have opted for local authorities as we believe this option not only provides the opportunity for developing local strategies based on evidence from each of the 32 local authorities but also for councils to work with their trade unions to develop and deliver suicide awareness and intervention training for their own workers with

input from specialist local and national voluntary sector organisation where appropriate.

Scottish Hazards could also play a part in delivering such training to supply chain employers, again this approach fits with the fair work framework and could be an innovative way of reaching employers that would not normally engage in such initiatives.

3e) Please provide any additional comments or suggestions about maximising the impact of national and/or local suicide prevention activity.

No additional comments

4a) Do you agree that we should develop an online suicide prevention presence across Scotland? (Tick one only)

Yes

No

Don't know

4b) Please explain your answer.

Effective use of social media could get the suicide prevention message communicated to a wide reaching audience but this would require to be targeted at the appropriate channels for the age groups and audiences, for example trade unions, their reps and Scottish Hazards would have an interest in engaging with social media with a specific focus on workplace issues that can impact on workers' mental health while others may not.

4c) Please provide any additional comments or suggestions about developing social media and/or online resources for suicide prevention.

No additional comments

5) Please use this space to provide any additional comments that you have about any of the issues raised in this engagement paper.

Scottish Hazards welcomes the opportunity to participate in this engagement exercise but would urge the Scottish Government to ensure the consultation provides some recognition of the role trade unions have in workplace negotiating preventative strategies and developing workplace learning and training around suicide prevention.

We would also like to see some emphasis on the provision of fair work and its role in creating work environments where workers are less likely to hide their mental ill health from employers and colleagues and, in turn reduce the risk of work-related suicide.

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April 2018

ⁱ <https://www.tuc.org.uk/sites/default/files/focusonhealthsafetyreport.pdf>

ⁱⁱ <https://www.samaritans.org/dying-from-inequality/report>

ⁱⁱⁱ A profile of deaths by suicide in Scotland 2009-2015: page 52

^{iv} A profile of deaths by suicide in Scotland 2009-2015: page 52

^v <http://www.hse.gov.uk/enforce/incidselcrits.pdf>

^{vi} <https://www.thecourier.co.uk/news/local/fife/60299/no-inquiry-over-fife-bt-managers-suicide/>

^{vii} <http://www.hazards.org/suicide/suicidalwork.htm>

^{viii} <https://www.suicidepreventionaust.org/sites/default/files/resources/2016/Work-and-Suicide-Prevention-FINAL%5B1%5D.pdf>

^{ix} Work and Suicide – a TUC guide to prevention for trade union activists;
<https://www.tuc.org.uk/sites/default/files/work-and-suicide.pdf>

^x Hazards Magazine; February 2018, Check it Out,
<http://hazards.org/suicide/suicideprevention.htm#checkitout>

^{xi} <http://www.gmb.org.uk/WORKANDSUICIDE.pdf>