



## **Introduction**

The Institution of Occupational Safety and Health (IOSH), is the only Chartered body for occupational safety and health professionals, with over 47,000 members in more than 130 countries. We welcome the opportunity to comment on the UK Government's important consultation on *Advancing our health: prevention in the 2020s*.

IOSH believes that 'good work' is good for health and wellbeing and **all** work should be good. This means, among other positives, that work should be safe, healthy and supportive and accommodate individual employee needs. This can help protect workers and help them to lead healthy extended working lives, as well as ensuring successful organisations and sustainable futures for everyone. IOSH advocates a strong multidisciplinary approach that harnesses the input of trained OSH professionals as part of workplace teams. This is important in order to promote prevention and tackle the non-clinical issues related to OSH risk management.

## **Summary IOSH position**

IOSH advocates action in many areas to prevent work-related ill health, including on healthy workplaces, mental health at work and tackling fatigue.

For workplaces, these include timely implementation of the *Thriving at Work* and *Good Work* reports; tax-breaks and subsidies for occupational health provision; training of managers in health and wellbeing; research into musculoskeletal health at work and exposures to new technologies; improved air-quality for outdoor workers; and health and safety protection for older and vulnerable workers. For mental health, more education about what constitutes 'good work' and how employers can ensure that this is what they are providing, together with government policy that requires and supports its provision and access to occupational health services. And for tackling fatigue, awareness of the impact of: sleep apnoea; intelligent shift work rotas; good sleep hygiene; right to switch off; reducing commuting; flexible hours; and preventing harassment.

## **IOSH response to consultation questions**

**Q8** - *There are many factors affecting people's mental health. How can we support the things that are good for mental health and prevent the things that are bad for mental health, in addition to the mental health actions in the green paper?*

In addition to the mental health actions in the green paper, IOSH advocates that there should be:

- More education about what constitutes 'good work' that supports mental and physical health and how employers can ensure that this is what they are providing
- More focus on government policy that requires and supports the provision of good quality work and access to occupational health services



**Q9** - *Have you got examples or ideas about using technology to prevent mental ill-health, and promote good mental health and wellbeing?*

In respect to the positive use of technology to support mental health, IOSH is aware of the following, each of which will need to be evaluated to assess its efficacy:

- The '[Mates in mind](#)' online-resources aiming to promote workplace mental health
- '[Every mind matters](#)' online initiative providing free resources to help people improve their mental health

IOSH has commissioned research into seafarers' mental health and wellbeing and we understand from the initial research findings (still to be peer-reviewed) that providing internet facilities can help seafarers maintain their social-ties at home. This research is due for publication later this year and for more information, contact [www.iosh.com/researchfund](http://www.iosh.com/researchfund).

**Q10** - *We recognise that sleep deprivation (not getting enough sleep) is bad for your health in several ways. What would help people get 7 to 9 hours of sleep a night?*

In order to help tackle sleep deprivation and associated fatigue, IOSH would suggest:

- More awareness of 'sleep apnoea' and how to recognise and treat it, particularly for professional drivers and other safety-critical roles
- Employer appreciation of the impact of long commuting-times and travel-reduction methods, such as more use of video-conferencing
- The adoption of intelligent shift work rotas and management of fatigue at work (see HSE's [HSG256 Managing Shiftwork](#) and [Human factors: Fatigue](#))
- The promotion of good sleep hygiene (see HSE [Hints and tips for shift-workers](#))
- Ensuring workers hours are monitored and that they are not encouraged to work excessive hours
- Evaluation of the impact of the 'right to switch off' legislation and similar corporate policies on the length of workers' sleeping time
- Ensuring workers are not subjected violence and to harassment at work, which can lead to depression, anxiety and sleeping problems
- Employer appreciation of the impact of 'caring responsibilities' that may disturb sleep and the benefits of a flexible approach to working hours

**Q13** - *What would you like to see included in a call for evidence on musculoskeletal (MSK) health?*

IOSH would like to see the following in a call-for-evidence on MSK health:

- Good practice studies on supporting workers who may have work-related and/or non-work-related MSKs
- Good practice studies on preventing the development of new MSK conditions or exacerbation of existing ones
- Research into the advantages / disadvantages of using 'exoskeletons' and similar 'assistive technology'
- The links between psychosocial risk and MSK health at work
- Research into co-morbidity and how to support better MSK health in an ageing workforce



**Q14** - *What could the government do to help people live more healthily in workplaces?*

In order to help people live more healthily in workplaces, IOSH recommends that the Government:

- Ensures timely implementation of the Stevenson / Farmer review recommendations on mental health at work (*Thriving at work report*)
- Ensures timely implementation of the Matthew Taylor review into modern working arrangements (*Good Work report*)
- Provides tax-breaks and subsidies to employers providing certain occupational health support
- Encourages more training of line managers in managing occupational health and wellbeing
- Funds the regulator to ensure adequate enforcement of health-related requirements at work
- Promotes updated NICE guidelines on physical activity in the workplace
- Ensure new and modified workplaces are 'healthy by design'
- Funds research into long-term health effects of work-related exposure to EMF and new technologies, such as nanotechnology
- Acts to improve environmental air-quality for outdoor and transport workers
- Extends the UK gangmasters licensing regime to cover more at-risk sectors to help ensure adequate OSH management
- Explores a labelling system denoting when products / services have been produced by workers in healthy working conditions, in order to help incentivise improvements

**Q15** - *What is your priority for making England the best country in the world to grow old in, alongside the work of Public Health England and national partner organisations? E.g. Support people with staying in work, training to change careers in later life and/or caring for a loved one?*

In order to see England become one of the best countries in the world to grow old in, IOSH would like to see the following prioritised:

- All work should be 'good work', which means, among other elements, that work is safe, healthy and supportive, and that is also fulfilling, secure, with appropriate autonomy and progression – so that everyone can fulfil their potential
- The needs of older workers should be accommodated via suitably flexible working arrangements, so that more workers can benefit from safe and healthy extended working lives

**Q16** - *What government policies (outside of health and social care) do you think have the biggest impact on people's mental and physical health? Please describe a top 3*

In addition to Health and Social Care, IOSH believes that Government policies with the biggest impact on people's health are:

- Employment
- Education
- Social security



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**Q20** - *What other areas (in addition to those set out in this green paper) would you like future government policy on prevention to cover?*

In addition to those set out in the green paper, IOSH would like to see a future Government prevention policy also cover:

- Preventing work-related cancers in line with IOSH's *No Time to Lose* campaign
- Campaigns to raise awareness and tackle exposure to Respirable Crystalline Silica at work
- Promoting the 'safe work' message to employers and workers, especially for self-employed tradespeople in construction or agriculture (work-related fatal injury statistics show that workers aged 60 and over feature disproportionately, see Information sources)
- Timely implementation of the Hackitt review recommendations on building regulation and fire safety
- Strengthened requirements for transparency in supply chains to help drive better health and safety for vulnerable workers (see [www.iosh.com/modernslaverywhitepaper](http://www.iosh.com/modernslaverywhitepaper))
- Research into MSK health and also into the health effects related to new technology

#### **Information sources**

1. EU-OSHA. (2013). *Priorities for OSH research in Europe 2013-20*. <https://osha.europa.eu/en/publications/reports/priorities-for-occupational-safety-and-health-research-in-europe-2013-2020>
2. EU-OSHA. (2018). *Foresight on new and emerging occupational safety and health risks associated with digitalisation by 2025* (European Risk Observatory report).
3. Eurofound. (2019). *Right to switch off*. [www.eurofound.europa.eu/observatories/eurwork/industrial-relations-dictionary/right-to-switch-off](http://www.eurofound.europa.eu/observatories/eurwork/industrial-relations-dictionary/right-to-switch-off)
4. Hackitt, J. (2018). *Building a safer future – independent review of building regulations and fire safety: final report*. [www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report](http://www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report)
5. HSE. (2006). *Managing Shiftwork* (HSG256) [www.hse.gov.uk/pubns/priced/hsg256.pdf](http://www.hse.gov.uk/pubns/priced/hsg256.pdf)
6. IOSH. (2016). *IOSH response to State Pension Age Independent Reviewer's call for evidence*. [Contact IOSH for copy]
7. IOSH. (2019). Press release *Older workers account for quarter of workplace deaths, new figures reveal*. [www.iosh.com/more/news-listing/annual-workplace-fatality-figures-iosh-response/](http://www.iosh.com/more/news-listing/annual-workplace-fatality-figures-iosh-response/)
8. IOSH. (2019). *Tackling modern slavery together: the roles of governments, employers, professionals and the public* [www.iosh.com/modernslaverywhitepaper](http://www.iosh.com/modernslaverywhitepaper)
9. IOSH. (due 2019). *Safeguarding seafarer mental health*.
10. NICE. (2008, due for update). *Guidelines on physical activity in the workplace* (PH13). [www.nice.org.uk/guidance/ph13](http://www.nice.org.uk/guidance/ph13)
11. Stevenson, D. and Farmer, P. (2017). *Thriving at Work*. [www.gov.uk/government/publications/thriving-at-work-a-review-of-mental-health-and-employers](http://www.gov.uk/government/publications/thriving-at-work-a-review-of-mental-health-and-employers)
12. Taylor, M. (2017). *Good Work: the Taylor review of modern working practices*. [www.gov.uk/government/publications/good-work-the-taylor-review-of-modern-working-practices](http://www.gov.uk/government/publications/good-work-the-taylor-review-of-modern-working-practices)

For more about IOSH, our members and our work please visit our website at [www.iosh.com](http://www.iosh.com). Our five-year strategy can be viewed at [www.ioshwork2022.com](http://www.ioshwork2022.com) and our resources specifically tailored for business can be found here [www.iosh.co.uk/ioshmeansbusiness](http://www.iosh.co.uk/ioshmeansbusiness).

Please direct enquiries about this response to:

Richard Jones  
IOSH Head of Policy and Regulatory Engagement  
[richard.jones@iosh.com](mailto:richard.jones@iosh.com) or [consultation@iosh.com](mailto:consultation@iosh.com)  
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