



OFFICE OF RAIL REGULATION

ORR position paper on work related stress in the rail industry 2014

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1. Introduction

Stress is recognised by both rail employers and trades unions as a key health concern within our industry, with significant costs to individuals and businesses. Failure to properly manage work related stress can lead to ill-health, an increase in human error in the workplace, and can be costly to employers. A [2014 RSSB report](#) estimates the total annual costs to the rail sector of impaired health to be around £790 million per year. In the [2012 TUC survey](#), over two thirds of rail safety representatives identified stress as the main hazard in our industry. Although accurate data on the prevalence of stress related illness in the rail industry are not available, associated costs are likely to be very considerable.

In April 2014 we published our second [occupational health programme for 2014-19](#) which focuses on embedding the health and wellbeing of railway workers into the culture of our industry. It seeks to move the rail industry beyond consistent legal compliance towards excellence in managing occupational health, ensuring a more efficient, productive and healthier workforce. This document supports this programme by setting out how we will work with the industry to support improved management of work related stress. We make clear our expectations on rail employers to focus on preventing work related stress through organisational changes and job design. As it is not possible to design out stress completely, managed interventions aimed at helping individuals to stay well and at work can help to support prevention at an organisational level, as part of a comprehensive three tier approach to managing stress. The priority on prevention builds on the principles in our 2011-14 stress strategy, the background to which is set out in Annex 1.

2. Where is the rail industry now?

There is a clear consensus across the rail industry that the psychological wellbeing of its workers is fundamental to its success, and there is evidence of a more proactive approach from industry groups and individual rail companies in this area.

Following a cross industry project to foster closer collaboration, RSSB published its [Railway Health and Wellbeing Roadmap](#) in 2014 to deliver better workforce health and wellbeing. This clearly recognises the need to promote stress management within the workplace, including better job design and roles, in order to build employee engagement. RSSB has produced guidance for the industry on the importance of [good job design](#) in building employee engagement; and on [rehabilitation](#), as well as [filmed good practice case studies](#) on stress risk assessment in practice, and on preventing work related stress within ORR.

In its Employee Health and Wellbeing Strategy for 2013-24, Network Rail identifies mental wellbeing as one of its six immediate priorities and commits to considering the impact of organisational factors on employee wellbeing. London Underground Limited continues its focus on stress and personal resilience via its Mental Health Improvement Plan, including interventions to influence attitudes and drive behavioural change. Many train operators have shown a renewed focus on better trauma management and improving mental health as part of wider wellbeing, with examples of [good practice case studies](#) from Arriva Train Wales, First ScotRail and London Overground on our web site.

Despite this encouraging progress, most stress management interventions within the rail industry still tend to focus on the individual, by building personal resilience and supporting return to work via counselling, and on managing for attendance. In many cases a key element is missing: preventing harmful levels of stress developing by means of a systematic risk assessment to identify changes to the organisation and/or the job design, rather than the individual. This prevention is the main area where we want rail employers to do more.

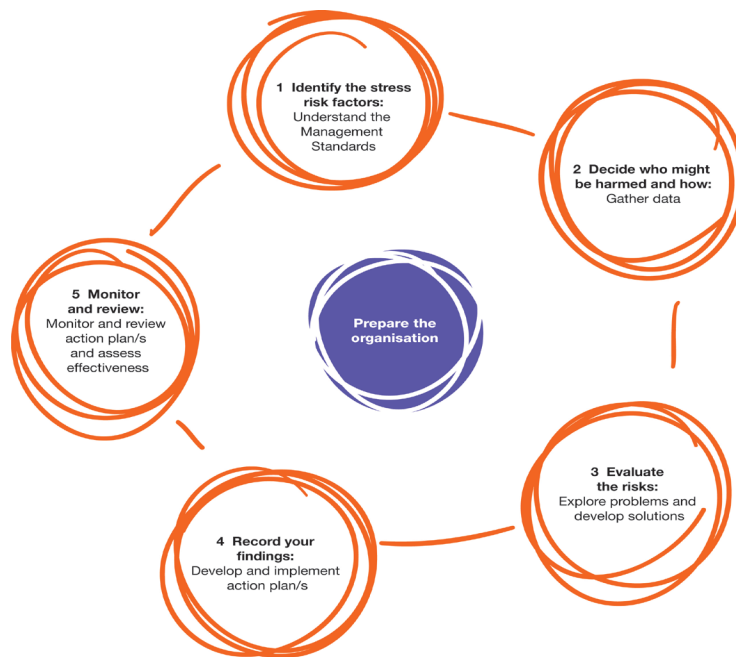
3. What does health and safety law require, and what is good practice?

Preventing harmful levels of stress should be the cornerstone of an effective stress management system. Employers have a legal duty under the Management of Health and Safety at Work Regulations 1999 to carry out a suitable and sufficient risk assessment for work related stress, and to put in place preventive and protective measures to reduce the risk, so far as is reasonably practicable.

There are established approaches and guidance to help employers meet this legal duty. The [HSE stress management standards approach](#), supported by the International Stress Management Association; ACAS; Chartered Institute of Personnel and Development (CIPD), the TUC, and Local Government Employers, as well as the [HSE/CIPD Management Competence Tool](#), provide a well-tested framework for assessing and reducing work related stress.

Use of the HSE management standards is not required by law. It can, however, help in demonstrating the suitable and sufficient risk assessment required under the Management of Health and Safety at Work Regulations 1999. There are other toolkits which take a similar approach to identifying the underlying causes of work stress at an organisational level, which rail employers might also choose to use.

The management standards approach requires managers, employees and their representatives to work together to improve six key areas of work that, if properly managed, can help to reduce work related stress. They are aimed at an organisation rather than an individual, so that more employees can benefit from any actions taken.



HSE management standards approach to stress risk assessment

(Source: HSE publication HSG 218 - Managing the causes of work-related stress¹)

In developing our overall model for supporting better stress management in the rail industry, we have built on HSE’s extensive experience in applying its management standards approach with employers across many industry sectors. We also recognise that a comprehensive three-tier approach to managing work related stress (combining primary, secondary and tertiary level interventions) is most likely to deliver excellence.

Primary level intervention - The main priority for employers should be to assess and reduce the risk of harmful levels of workplace stress from occurring. This is a legal duty and may require action at an organisational level, for example by changes to job design, task allocation, training, and supervision.

Excellent employers will go beyond this legal compliance to demonstrate best practice by providing secondary and tertiary level interventions which focus on supporting the individual.

Secondary level intervention - Good practice at the secondary level typically involves building individuals’ ability to cope with stress, for example by emotional resilience training,

¹ Public sector information licensed under the Open Government Licence v2.0 at <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/2/>

relaxation, or mindfulness; employee assistance programmes (EAPs); ‘buddying’ schemes; or healthy lifestyle promotion.

Tertiary level intervention – This focuses on recovery and rehabilitation, for example trauma focussed cognitive behavioural therapy; counselling; EAPs and staged returns to support early return to work.

Secondary and tertiary level interventions are not required by health and safety law but are good employment practice, and can bring significant business benefits. Tertiary interventions involving support and reasonable adjustments on return to work may also help rail employers to meet duties under civil law, particularly the Equality Act 2010.



4. What we will do

We will:

- Be clear on which elements of a stress management system are required by health and safety law, and what is good practice which employers may choose to do;
- Make clear our expectation that preventing harmful levels of stress at an organisational level should be the key priority for rail companies in managing work related stress. We will encourage use of the HSE management standards approach across the rail industry, but will not enforce its use.
- Make clear that we expect employers to have policies, procedures, and action plans for managing work related stress and trauma, with responsibilities clearly assigned, as part of duties under health and safety law;
- Reinforce the importance of involving the workforce both in identifying the problems and devising the solutions. That safety representatives are often in a unique position to help and can make real positive contribution to the process;
- Ensure that all our interventions with duty holders on work related stress are informed by the HSE management standards and management competence tool, and are consistent with principles in this document. We will focus on the organisational arrangements for assessing and minimising the risk of work related stress but will not generally get involved with individual cases of stress;
- Promote the benefits of a three tier approach to stress management as best practice, and incentivise the industry by illustrating the associated legal, moral, and critically the business benefits;
- Encourage the wider adoption of good clinical practice in managing affected workers, including the National Institute for Health and Care Excellence (NICE) guidance on [promoting mental wellbeing at work](#); on timing of interventions and treatment of [post-traumatic stress disorder](#); and proposed guidance on [workplace policy and management practices](#); and

- Support industry efforts to improve mental health and wellbeing in their workers as good business practice, including work facilitated by RSSB under the [Railway Health and Wellbeing Roadmap](#). We will promote wider use of support networks and resources from leaders in the field of mental health.

5. How we will do it

We will:

- Engage with individual rail companies – seek opportunities to present at senior management level, as well as discussions at local level via routine liaison meetings;
- Engage with appropriate industry groups, for example ATOC; Railway Industry Health and Safety Advisory Committee; RSSB; Railway Health and Wellbeing Policy Group; IOSH Rail Group; Infrastructure Safety Liaison Group; Rail Freight Operators Group;
- Engage with rail trade unions - to raise awareness of our approach and expectations on rail employers; highlight and explain the importance of employee involvement, and the key role of safety representatives; and secure their commitment;
- Communicate a clear consistent message on what health and safety law requires, and what good practice in managing work related stress looks like, via presentations/events with industry and rail unions; and by providing guidance on our [stress web pages](#), and in our [quarterly update on ORR's health programme 2014-19](#);
- Seek and publicise information on the costs and benefits of implementing an organisational approach to managing work related stress to support development of business cases, and publish further good practice case studies on our [web site](#);
- Work with willing rail companies to support their implementation of a preventive, organisational approach to managing work related stress, and to share their experience and act as exemplars for others in the industry. For example, continue our work with Alstom Transport UK to pilot the management standards approach, and share their experience using a rail good practice case study;
- Publish and promote ORR guidance for the industry on use of our Railway Management Maturity Model (RM3) to assess management capability for occupational health, including a new risk control system (RCS6) for occupational health, with a worked example for management of work related stress;

- Work collaboratively with industry on stress and mental wellbeing, including work identified in the [Railway Health and Wellbeing Roadmap](#) on stress prevention, rehabilitation, resilience, and health data collection;
- Encourage rail businesses to commit to improve wider mental health and wellbeing across their workforce as good business practice. Promote participation in voluntary mental health pledges/charters, particularly the [Public Health Responsibility Deal Pledge H7 on mental health and wellbeing](#) ; and employer support networks, such as [Time to Change](#); and [Mindful Employer](#);
- Explore opportunities to link up with, and promote, relevant NHS, local government-led, or health charity initiatives on stress and mental health. Use our [stress web pages](#), [quarterly health programme updates](#), and health e-bulletin to highlight useful resources and events;
- Explore means of encouraging wider participation within the rail sector in sharing good practice on mental wellbeing, for example buddying within rail owning groups for example; or setting up a rail e-community on worker health and wellbeing; and
- Explore benchmarking of the rail sector against wider industry in adopting established good practice in stress management, particularly use of management standards approach, for example by reference to latest CIPD Absence Management survey results.

Annex 1 - Background to development of ORR's initial stress strategy 2011-14

Stress as a health issue in railways

ORR's [baseline review](#) of occupational health management in the rail industry in 2010 concluded that work related ill health including stress was a significant health issue in the railway industry. Labour Force Survey data obtained from HSE for 2003-04 to 2009-10 (which is self-reported) showed that railway workers reported a higher incidence of work related ill health when compared with comparable occupation groups, with the wider transport sector, and with all GB industry. HSE data from a sample of specialist consultants and GPs supported this finding, with a higher incidence of diagnoses by psychiatric specialists for rail workers when compared with the wider employed population.

Despite the relative poor quality of ill health data available for the rail industry as a whole, musculoskeletal disorders (MSDs) and stress were identified by the industry as their major work related ill health issues. RSSB research in 2005 identified the main health problems of concern to the rail industry (in descending order of concern) as MSDs, psychological (stress), and assaults. The [2010 TUC biennial survey](#) of safety representatives identified, across the wider transport and communications sector, stress as the most frequently identified hazard (59%), with bullying/harassment (43%), back strains (35%), slips on level (40%) and long hours (31%) also in the top five concerns. Concern about stress among safety representatives has since been reinforced in the [2012 TUC](#) survey; over two thirds of rail safety representatives identified stress as the main hazard in our industry.

It is widely recognised across all industry that work related stress has massive business costs. A 2003 report by The [Centre for Mental Health](#) estimated the business costs of mental health problems at work to be £26 billion a year, equivalent to £1035 for every employee in the UK workforce; 2009-10 estimates put the output losses to the UK economy at over £30 billion. More recent studies looking at total ill health costs, rather than stress specifically provide insight into the possible scale of the problem. A revised HSE cost model for 2010-11 estimates total costs to society from all work related illness at £8.4 billion. Over the same period 40% of cases of work related ill health were due to stress.

The rail industry's approach to stress management in 2011

London Underground Limited (LUL) was generally recognised as one of the rail industry leaders on health, and was particularly active in providing primary health care in the workplace including stress reduction and rehabilitation programmes². LUL reported that the cost of absences due to stress fell from £5.3M in 2004-05 to £1.6M in 2008-09 as a result of their stress reduction programme. An analysis of their 2009-10 private medical insurance claims¹ showed that psychiatric disorders ranked last place in the top ten conditions as measured through costs (2% total claims costs), due in part at least to the provision of comprehensive psychological support services.

Despite this success, the available evidence indicated that the main focus within many rail companies, including LUL, was very much on building personal resilience to stress, and on rehabilitation. It appeared that equal effort was not being applied by rail businesses to tackling work related stress by carrying out thorough risk assessments, implementing a targeted preventive approach, and in particular by adapting work. The role of managers and supervisors in managing ill-health, whilst recognised, was not yet embedded in the same way as for worker safety. In common with other industry sectors, management of work related stress was perceived as the remit of human resource (HR) departments with support from externally-positioned health service providers, rather than being integral to the line management role.

Our inspection work had found that arrangements for managing post traumatic stress in drivers and other staff liable to witness distressing events, including stress counselling and buddying of drivers, were generally effective. However, for those cases of work related stress arising from a wider range of workplace precursors (job design, workload, change), the indications were that the response was not always positive and that individuals may have needed significant contact with their GP, extensive time off, and were more critical of their employers' policies and procedures. Awareness and adoption of the [HSE stress management standards approach](#) and tools by rail companies appeared to be lower than would be expected from medium-large sized employers outside the sector.

² Dr Olivia Carlton, LUL, presentation to Infrastructure Safety Liaison Group for mainline contractors November 2010, plus additional case study information provided to ORR for inclusion on our website.

Moving the rail sector towards excellence

Having recognised a gap between the existing approach to stress management in rail and current best practice, ORR met with specialists from HSE in February 2011 to review their approach for tackling stress management. Lessons learnt from application of the HSE stress management standards with over 65 willing companies from five industry sectors over the previous ten years were discussed, and informed our initial 2011-14 stress strategy. Key themes in this initial strategy were the need to secure senior management commitment and employee involvement from the outset; the significant time and resource needed by the duty holder to do this properly; and the evident business benefits resulting from this approach.

Our current position paper builds on this strategic approach, continuing to nudge the industry forward towards accepted best practice, with prevention of harmful levels of stress as the priority within a comprehensive three tier stress management system.

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