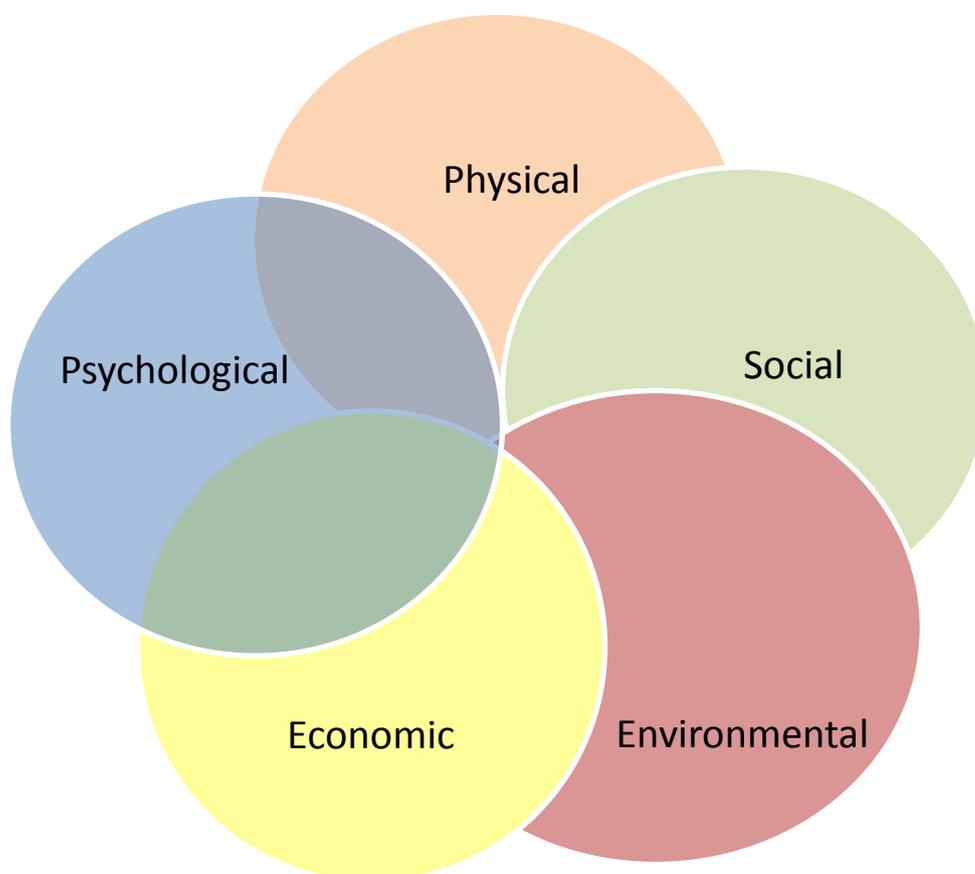


Long term conditions – developing a cross-government strategy

IOSH comments on the Department of Health consultation



Submission

08.06.12



Introduction

The Institution of Occupational Safety and Health (IOSH), the Chartered body for health and safety professionals, a registered charity and an international NGO, is pleased to provide comment on the Department of Health consultation to develop a cross-government strategy on long term conditions.

We know that generally ‘good work’ is good for health and wellbeing,¹ but that poorly managed work can cause serious harm. ‘Good work’, among other things, is work that is safe, supportive and accommodates people’s individual needs. We believe there needs to be a better understanding by employers and government about what constitutes ‘good work’ and how to provide more of it.

The current levels of work-related injury and illness, ageing population, growth in age- and lifestyle-related diseases and the government’s aim of a more inclusive workforce, all mean that employers need to become better at:

- Preventing injury and illness at work
- Improving health and wellbeing at work
- Supporting workers with long term conditions at work

IOSH provides free guidance on rehabilitation, health and wellbeing at work and managing occupational health issues, including the management of non-work conditions in the workplace. Our ‘occupational health toolkit’ covers stress, musculoskeletal disorders (MSDs), inhalation hazards and skin disorders, together with non-work conditions such as diabetes, stroke, pregnancy, coronary heart disease and cancer.²

In the response that follows, we provide a summary of our suggestions, specific comments on the ‘six shared goals’ listed by the Department of Health for a cross-government strategy (and reproduced below), followed by references and information about IOSH.

- People will be supported to stay healthy and avoid developing a long term condition, where possible.
- People will have their conditions diagnosed early and quickly.
- Services will be joined up, and based around individuals’ biological, psychological and social needs.
- People with long term conditions will be socially included, including succeeding in work and education.
- People with long term conditions will be as independent as possible and in control of their lives (up to and including the end of life).
- People with long term conditions will be supported to stay as well as possible.

Summary

In brief, IOSH believes key actions for the government should be to promote 'good work' and 'risk intelligence'; and to improve risk education and management, multidisciplinary working, occupational safety and health performance, appreciation of the business case for good health and safety, and the prevention of work-related harm.

Our 10 action points for government are:

1. Highlight the link between 'good work' and health and wellbeing, promoting work that is safe, supporting and accommodates people's individual needs.
2. Promote the economic case for good health and safety management at work – preventing injury and illness; improving health and wellbeing; and creating a sustainable workforce.
3. Use behavioural economics and remove tax disincentives for certain employer-provided therapies and access to facilities aimed at health improvement.
4. Support positive multidisciplinary working, good communications and high quality service provision in managing health at work issues.
5. Set an example in caring for government employees and in applying procurement standards for purchasing goods and services.
6. Create a more 'risk intelligent' society, embedding health, safety and risk in national, vocational and professional curricula, including for GPs, teachers and managers.
7. Provide occupational health resources for employers (especially SMEs) and GPs, including UK-wide advice lines and Independent Assessment Services.
8. Provide occupational health awareness training for medical students and GPs and relevant continuing professional development.
9. Provide adequate training and resourcing for the Health and Safety Executive so that its advice, guidance, enforcement and research are maintained.
10. Make serious work-related road traffic accidents reportable under RIDDOR and promote safer driving for work.

IOSH comments on the six shared goals for the cross-government long term conditions strategy

1. *People will be supported to stay healthy and avoid developing a long term condition (LTC), where possible.*

- Employers need to ensure that they provide working conditions that are safe and healthy and promote wellbeing.

To support this, government should ensure adequate levels of enforcement and advice and encourage the embedding of health and safety in the national education and training system. IOSH has developed a free Workplace Hazard Awareness Course and is working with Young Enterprise, Council for Learning Outside the Classroom and the engineering institutions to help develop risk management skills and create a more 'risk intelligent society'.

- Workplaces can be used to encourage healthy life-style choices and offer wellbeing programmes and employee health checks. IOSH has recently conducted a survey of 1,001 decision-makers in small- and medium-sized enterprises which found that substantial numbers of them felt that tax break would help their organizations and encourage them to provide more health support (see IOSH 'Safety in numbers' summary report).³

To support this, government should remove tax disincentives to encourage more employers to provide more health-related support and more workers to take it up. This would include tax breaks for certain treatment for non-work injury / illness and employer-subsidised access to public gyms and sports facilities; and the retention of tax relief for Employee Assistance Programmes. Government should also act as an exemplar in the care of its own staff and in the procurement standards it applies for purchasing goods and services, requiring good health and safety management practices in its supply chain.

- We need more public awareness and understanding of the harmful and long-lasting effects of exposure to health hazards at work. There should be more publicity about long-latency conditions that develop over years or decades following exposure (e.g. noise induced hearing loss; hand-arm vibration syndrome; chronic obstructive pulmonary disease; and asbestosis, pneumoconiosis and silicosis) and the need for better prevention.

To support this, government should highlight the estimated 8,000 work-related cancer deaths each year – together with the incidence of other long-latency conditions – and the steps employers should be taking to prevent them. This could include publicising the estimated annual cost of health and safety failures for individuals, employers and the economy. Government should also ensure adequate funding of occupational health research and an evidence-based approach to policy and practice. And they should share the lessons learned from the

occupational health provision at the Olympic Park development, in which a 'health like safety' approach was advocated.⁴

- It has been estimated that one third of road traffic accidents (RTAs) involve someone who is 'at work' – we believe that serious work-related RTAs should be reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). We believe this would ensure better investigation and 'visibility' on the corporate radar and help motivate improved management of occupational road risk, saving lives and preventing long-term illness and disability.

To support this, government should consult on making serious work-related RTAs reportable under RIDDOR and also emphasise the need for employers to ensure that their drivers are not suffering from fatigue, time pressure or in-car distraction, which are all risk factors for road traffic accidents.⁵

2. *People will have their conditions diagnosed early and quickly.*

- IOSH has been promoting early identification and early intervention of work-related conditions so that action can be taken to prevent conditions from developing or from becoming chronic.

To support this, government should help ensure that GP training and ongoing development adequately covers occupational health issues and that free occupational health advice lines are continued.

- IOSH has called for better access to professionals such as occupational physiotherapists for MSDs and cognitive behavioural therapists for mental health conditions, so that there is early provision of advice and identification of problems and solutions.

To support this, government should remove tax disincentives for certain employer provided health support for non-work conditions. Government should also work with others to ensure increased provision of professionals able to deliver evidence-based therapies.

- We believe more people at work should be able to recognise early signs of possible work-related illness, so that appropriate action can be taken. Employers, including government, should provide awareness training for workers, their representatives, line managers and occupational safety and health advisers.

To support this, government should encourage its own staff to be more aware of the early signs of possible work-related illness and how to prevent it developing into a problem.

3. Services will be joined up, and based around individuals' biological, psychological and social needs.

- IOSH has been promoting closer multidisciplinary working and a biopsychosocial (holistic) approach to health-related issues and has developed a course (with part DWP funding) to help upskill health and safety practitioners in return to work and rehabilitation issues. We are also keen to improve communications between workers, employers, healthcare professionals and GPs on managing health conditions at work. IOSH is currently funding an 8 month feasibility study examining how to improve employer to GP communication on rehabilitation and return to work issues.

To support this, government could help promote the business case for effective attendance management and return to work programmes and consider encouraging uptake of training through appropriate employer subsidies. They should also apply the lessons learned from the 'fit for work' service pilots (offering case-managed, multidisciplinary support),⁶ implemented as one of Dame Carol Black's recommendations following her review of the health of the working age population.⁷

- IOSH has supported Dame Carol Black's recent recommendation⁸ for the establishment of an Independent Assessment Service for GPs and employers to access expert advice on return to work issues.

To support this, government should provide funding for the provision of such a service and also commit to providing tax relief for employer interventions aimed at supporting employees with long term conditions at work or speeding their return (e.g. medical treatments or vocational rehabilitation)

4. People with long term conditions will be socially included, including succeeding in work and education.

- IOSH has called for workplaces to be more 'worker-friendly' and promote the provision of reasonable adjustments and flexible working arrangements that help employees to manage their work-life balance and their health conditions.

To support this, government should publicise the 'Access to Work' fund more widely and ensure it is adequately maintained. Government should also work with others to help reduce the stigma associated with mental illness, through awareness-raising campaigns etc. And they should help raise awareness of relevant research such as that into meeting the employment and career aspirations of those with multiple sclerosis.⁹

5. *People with long term conditions will be as independent as possible and in control of their lives (up to and including the end of life).*

- IOSH believes that supporting people with long term conditions in their chosen occupations and careers can help them to remain independent. Employers need access to resources and advice to enable them to do this.

To support this, government should encourage improved training in occupational health issues for GPs; ensure free access to occupational health advice lines and services; and remove tax disincentives from employers wanting to provide certain health support for their workers.

6. *People with long term conditions will be supported to stay as well as possible.*

- As long term worklessness is associated with poor mental and physical health, we believe that supportive employers and 'good work' are important in helping people with long term conditions to maintain their health and stay as well as possible.

To support this, government should promote the economic argument for good health and safety and provide employers and GPs with the resources and advice they need.

References

1. Waddell G and Burton K. *Is work good for your health and wellbeing?* London: The Stationery Office, 2006. www.dwp.gov.uk/docs/hwwb-is-work-good-for-you.pdf
2. IOSH. 'Working well – guidance on promoting health and wellbeing at work' (www.iosh.co.uk/workingwell); 'A healthy return – good practice guide to rehabilitating people at work' (www.iosh.co.uk/healthyreturn); and *Occupational health toolkit* (www.ohtoolkit.co.uk)
3. IOSH. *Safety in numbers – how small businesses in the UK see tax breaks, insurance cuts and other health and safety management incentives.* Wigston: IOSH, 2012. www.iosh.co.uk/safetyinnumbers.aspx
4. Tyers C and Hicks B. *Occupational health provision on the Olympic Park and Athletes' Village* (RR921). Sudbury: HSE Books, 2012. www.hse.gov.uk/research/rrpdf/rr921.pdf
5. Grayson G and Helman S. *Work-related road safety – a review of the evidence for interventions – research summary.* Wigston: IOSH, 2011. www.iosh.co.uk/researchreports
6. Hillage J. *Evaluation of the Fit for Work Service pilots: first year report* (DWP RR 792). London: DWP, 2012. <http://research.dwp.gov.uk/asd/asd5/rrs-index.asp>
7. Black C. *Working for a healthier tomorrow – a review of the health of Britain's working age population.* London: The Stationery Office, 2008. www.dwp.gov.uk/docs/hwwb-working-for-a-healthier-tomorrow.pdf
8. Black C and Frost D. *Health at work – an independent review of sickness absence.* London: The Stationery Office, 2011. www.dwp.gov.uk/docs/health-at-work.pdf
9. Bevan S, Zheltoukhova K, McGee R and Blazey L. *Ready to Work? Meeting the Employment and Career Aspirations of People with Multiple Sclerosis.* London: The Work Foundation, 2011. www.theworkfoundation.com/DownloadPublication/Report/289_289_MS3.pdf

About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 41,500 members in over 85 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity, and an ILO international NGO and CIS collaborating centre. The IOSH vision is:

“A world of work which is safe, healthy and sustainable”

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active [research and development](#) fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled *Policy and practice in health and safety*. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free on-line tools and guides, including websites for business start-ups and young people; an occupational health toolkit; and a risk management tool for small firms.

IOSH has 30 Branches in the UK and worldwide including the Caribbean, Hong Kong, Isle of Man, Middle East, the Republic of Ireland and Singapore, 17 special interest groups covering aviation and aerospace; communications and media; construction; consultancy; education; environment; fire risk management; food and drink; hazardous industries; healthcare; international; offshore; public services; railways; retail and distribution; rural industries; and sports grounds and events. IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of more than 1,600 organisations. We issue around 100,000 certificates per year.

For more about IOSH, our members and our work please visit our website at www.iosh.co.uk

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