

# CCLA Corporate Mental Health Benchmark

Assessment criteria 2024



**CCLA**

GOOD INVESTMENT

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# Introduction

We believe that the human and economic costs associated with poor workplace mental health represent an increasingly substantial obstacle to corporate success. As investors, we place great emphasis on stewardship in pushing for positive change at the companies in which we invest. We have been leading engagement initiatives on workplace mental health since 2019; the CCLA Corporate Mental Health Benchmark is the culmination of this work.

The [CCLA website](#) provides full details of our engagement initiatives on mental health.

## Benchmark design and governance

In 2020 we commissioned Chronos Sustainability to build the CCLA Corporate Mental Health Benchmark and convened an Expert Advisory Panel to guide our work. Members of the panel include the original architects of the UK government-commissioned 'Thriving at Work'<sup>1</sup> review, Paul Farmer CBE (CEO, Age UK) and Lord Dennis Stevenson CBE (former Chair, HBOS, Pearson, GPA). Panel members also include Elizabeth Sheldon (COO, CCLA); Dr Shekhar Saxena (Harvard T. H. Chan School of Public Health); Dr Junko Umihara (Showa Women's University); Dr Richard Caddis (Chief Medical Officer, BT); and Remi Fernandez (United Nations Principles for Responsible Investment).

Given that the benchmark is designed as an investor tool, it takes a 'management systems framework' approach. This allows us to evaluate the scope of leadership commitments, related policies, and workplace programmes in place at large, listed companies. The method ensures that the benchmark pays particular attention to the internal governance conditions necessary for changing and shaping corporate actions on mental health in the workplace.

A pilot benchmark was conducted in August 2021, which assessed the 30 largest UK-listed companies with large workforces. The pilot benchmark report is available [here](#).

In 2022, we expanded the benchmark to assess the 100 largest UK-listed companies with more than 10,000 employees. The inaugural CCLA Corporate Mental Health Benchmark UK 100 was launched in May 2022 and the report is available [here](#).

This was followed by the launch of the inaugural CCLA Corporate Mental Health Benchmark Global 100 in October 2022, assessing the 100 largest listed companies with more than 10,000 employees globally. The accompanying report is available [here](#).

The 2022 benchmark results revealed encouraging signs that mental health was acknowledged by companies as an important business issue. The overall average scores of the UK 100 and Global 100 benchmarks – 35% and 25%, respectively – indicated, however, that more work was needed to formalise company approaches to workplace mental health and to improve disclosure.

In 2023, we carried out the second annual CCLA Corporate Mental Health Benchmark. The [UK 100 report](#), which assessed the largest UK-listed companies with more than 10,000 employees, was published in June 2023. The [Global 100+ report](#), which assessed the largest listed global companies with more than 10,000 employees, was published in October 2023. The 2023 benchmark results showed that mental health remains on the business agenda and that several companies are taking steps to improve their public reporting on mental health. In common with the 2022 benchmarks, however, the overall average scores of the 2023 UK 100 and Global 100+ benchmarks – 40% and 28%, respectively – show that there is still much room for improvement.

## 2024 benchmarking process

In 2024, we will again assess two sets of listed companies – a UK group to be assessed in March 2024 and a global group to be assessed in June 2024.

Every company will be assessed based on information that is publicly available in its corporate disclosure at the time of the assessment. The evaluation will focus on the parent entity, although some credit can be given to companies managing mental health in specific regions or markets if the information is clearly available.

After completing preliminary assessments, we will share our findings with each company individually. They will then have a three-week period to come back to us with suggested amendments or to point us to any information in the public domain that we may have missed. Our Expert Advisory Panel members will undertake a final review before the results are finalised.

Benchmark reports will be published in June (UK) and October (Global) 2024. All companies will receive their finalised assessment report with recommended actions for improvement.

## Changes to 2024 assessment criteria

The assessment criteria for 2024 include a number of minor revisions to align our methodology more closely with the recommendations in the recent WHO/ILO policy brief on the 'WHO guidelines on mental health at work'.<sup>2,3</sup> Further details of the gap analysis undertaken between the CCLA mental health criteria and the recommendations in the WHO/ILO policy brief are available in the [2023 Global 100+ report](#). We have also made some minor revisions to the criteria based on learnings from the 2023 assessment cycles.

### Alignments with WHO/ILO policy brief on the 'WHO guidelines on mental health at work'.

**Question 18** (Are employees given the opportunity to directly contribute to the design or development of workplace mental health initiatives?) is now (a) Are employees given the opportunity to directly contribute to the design or development of workplace mental health initiatives? b) Does the company adapt mental health programmes to local contexts?). An additional 5 points are available for this question.

**Question 20** (Does the company conduct third-party assurance of its mental health strategy and practices?) is now (Does the company independently assure its mental health management system against a recognised framework or standard?).

**Question 21** (Does the company participate in industry initiatives or partnerships aimed at promoting positive mental health in the workplace? Are customers or suppliers involved?) is now (a) Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health? b) Does the company engage customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health?).

For these three questions, the rationale, scoring details and explanatory notes have been adjusted and are detailed below.

## Additional methodology clarifications

For the following three questions, further clarification has been added to the wording of the rationale, scoring text or explanatory notes. The questions themselves have not changed.

**Question 8** (Does the company support the principles of good work by having a formal position on board-employee information and consultation?)

**Question 22** (Does the company provide examples of employee communications on workplace mental health?)

**Question 24** (Does the company report on progress against its objectives or targets related to mental health?)

### Formatting changes

Several two-part questions have been re-formatted to delineate more clearly the two sub-questions. With the exception of question 21 (as outlined above), the questions themselves have not changed.

**Question 4** (Does the policy statement (or equivalent) provide a clear explanation of scope?) is now (a) Does the policy statement (or equivalent) provide a clear explanation of worker scope? b) Does the policy statement (or equivalent) provide a clear explanation of geographical and business area scope?)

**Question 12** (Has the company assigned management responsibility for workplace mental health to an individual or specified committee?) is now (a) Has the company assigned board or senior management responsibility for workplace mental health? b) Has the company assigned day-to-day operational management responsibility for workplace mental health?)

**Question 14** (Does the company provide mental health training: a) to line managers? b) to dedicated individuals (e.g. mental health first aiders?) is now (a) Does the company provide mental health training to line managers? b) Does the company provide mental health training to dedicated individuals (e.g. mental health first aiders)?

**Question 15** (Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace?) is now (a) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace? b) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace that extend beyond employees and contingent workers, e.g. to customers and/or suppliers?)

**Question 21** (Does the company participate in industry initiatives or partnerships aimed at promoting positive mental health in the workplace? Are customers or suppliers involved?) is now (a) Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health? b) Does the company engage customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health?)

**Question 25** (Does the company report on the proportion of line managers or dedicated individuals in the workforce that are trained in workplace mental health?) is now (a) Does the company report on the proportion of line managers that are trained in workplace mental health? b) Does the company report on the proportion of dedicated individuals that are trained in workplace mental health?)

For the 2024 benchmark assessments, the overall maximum scoring available will change from 212 to 217 points as a result of the above revisions.

The following pages show the criteria against which each company will be assessed.

## CCLA Corporate Mental Health Benchmark Assessment

Section	Maximum achievable score
Management commitment and policy	68
Governance and management	77
Leadership and innovation	22
Performance reporting and impact	50
Total score	217

# Management commitment and policy

## Question 1

Does the company acknowledge workplace mental health as an important concern for the business?

### Rationale

Acknowledging mental health as a business issue is an important first step towards implementing a comprehensive approach to workplace mental health. It is good practice for companies to describe the business risks and opportunities presented by workplace mental health.

### Scoring

- |    |  |
|----|--|
| 0  | No evidence that mental health is regarded as a relevant business issue.   |
| 5  | The company identifies mental health as a relevant business issue but does not provide a clear explanation of the drivers for managing workplace mental health.                          |
| 10 | The company identifies mental health as a relevant business issue and provides a clear description of the risks and opportunities that can arise through mental health in the workplace. |

Maximum achievable score 10

### Explanatory notes

- This question is looking for an acknowledgement by the company that workplace mental health is recognised as an important business issue.
- Companies that acknowledge mental health as an important concern and set out the reasons why mental health might be a business issue (e.g. rising mental health concerns and public awareness, impact on productivity and outgoings, sickness and absence rates, recruitment and retention) are awarded the maximum points.
- Companies that acknowledge workplace mental health as a business issue but do not set out the drivers for managing mental health are awarded partial points.
- The inclusion of mental health as a principal risk or as an explicit subject in a materiality matrix, even if considered to be a low priority, is sufficient for partial points to be awarded for this question.

## Question 2

Is there a statement from the CEO signalling the company's leadership commitment to workplace mental health?

### Rationale

It is good practice for companies to signal their commitment to workplace mental health at the highest level of leadership.

### Scoring

- |    |  |
|----|--|
| 0  | No evidence of CEO statement on workplace mental health.   |
| 10 | Clear evidence of the CEO signalling the company's leadership commitment to workplace mental health. |

Maximum achievable score 10

### Explanatory notes

- Companies should signal their absolute commitment to workplace mental health via a CEO statement or by acting as signatory to relevant codes, policies and/or programmes.
- Companies that present CEO statements in key corporate disclosure channels, such as the annual report and accounts, sustainability reporting, policies, business updates or the corporate website are awarded maximum points.
- Whilst it is recognised that other executive sponsors may promote or lead the company's approach to mental health, this question is looking for evidence that the CEO, as the most senior officer of the company, is willing to champion the issue and to signal that it is being led from the leadership team.

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### Question 3

Does the company publish an overarching corporate mental health policy (or equivalent)?

#### Rationale

It is good practice for companies to formalise their approach to workplace mental health in a policy (or equivalent document). While the existence of a policy (or equivalent) may not provide a guarantee of implementation or supportive practices, the absence of a policy is a clear sign that workplace mental health is not firmly on the business agenda.

#### Scoring

0	No evidence of a formal policy statement (or equivalent) on workplace mental health.
5	The company has a broad commitment to workplace mental health in a policy statement (or equivalent) but provides no description of how the policy is to be implemented.
10	The company demonstrates a clear commitment to workplace mental health in a policy statement (or equivalent) and provides a description of the processes in place to ensure that the policy is effectively implemented.

Maximum achievable score 10

#### Explanatory notes

- The assessment does not differentiate between companies that publish stand-alone workplace mental health policies and companies that incorporate workplace mental health into wider health and safety or employee wellbeing policies (or equivalent).
- Companies that publish a clear statement of commitment to workplace mental health and/or principles related to workplace mental health, which are a starting point for the company's accountability to its stakeholders but do not describe how these commitments are to be implemented are awarded partial points.

- Policies issued by company subsidiaries are not considered as overarching policies, and companies with such policies but no overarching (i.e. at the parent company level) policy are therefore not awarded points for this question. Subsidiary policies will be evaluated elsewhere in the assessment.
- Policies focused on specific workplace management issues (e.g. diversity and inclusion where workplace mental health is mentioned in passing) are not considered as overarching policies. These policies are considered when deciding whether to award points for questions 1 and 6–11.
- To score maximum points, company workplace mental health policies need to include most/all of the following:
  - A clear statement of the reasons why workplace mental health is important to the business (including both the business case and the ethical case for action).
  - A commitment to compliance with relevant legislation.
  - A clear position regarding expected standards of workplace mental health.
  - A description of the processes in place to ensure that the policy is effectively implemented (e.g. senior management oversight, commitments to continuous improvement, performance monitoring, corrective action if the policy is not being effectively implemented).
  - A commitment to continuous improvement and public reporting on performance.
  - Signpost to other corporate commitments which support mental health and good work, such as diversity and inclusion, fair pay, employee consultation and career progression.



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#### Question 4

- a) Does the policy statement (or equivalent) provide a clear explanation of worker scope?
- b) Does the policy statement (or equivalent) provide a clear explanation of geographical and business area scope?

#### Rationale

Understanding the scope of a policy is important to understanding the breadth of a company's commitment to action on workplace mental health. Companies are expected to apply a universal approach to managing workplace mental health covering all workers, including contingent workers (e.g. contractors, interns, gig workers, temporary staff, etc.), and all relevant geographies in which the company operates.

#### Scoring

##### 4a. Worker scope

- |   |   |
|---|---|
| 0 | Worker scope is not specified.                              |
| 1 | Worker scope inferred but not clearly defined.              |
| 3 | Scope is limited to employees.                              |
| 5 | Scope is universal to all employees and contingent workers. |

##### 4b. Geographical and business area scope

- |   |  |
|---|--|
| 0 | Geographical or business area scope is not specified.                                |
| 1 | Geographical and business area scope inferred but not clearly defined.               |
| 3 | Scope is partially described to include some geographies or business areas.          |
| 5 | Scope is relevant to all business areas and geographies where the business operates. |

Maximum achievable score 10

#### Explanatory notes

- This question is only scored if question 3 has been met fully or partially.
- The sub-questions on workers and geography/business areas are scored separately (i.e. companies could score maximum points in each of the two sub-questions).
- The question acknowledges that policies can vary from market to market and across geographies/business areas.
- Contingent workers may include sub-contractors, interns, gig workers, temporary staff (i.e. individuals who are distinct from employees but are treated as workers).



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### Question 5

Does the company have a clear management commitment to encouraging a culture of openness on mental health?

#### Rationale

A culture that encourages openness and dialogue on mental health and works towards eliminating stigma will support the effectiveness of a company's workplace mental health strategy and its implementation.

#### Scoring

- |    |  |
|----|--|
| 0  | No evidence of management commitment to encouraging a culture of openness on mental health.              |
| 10 | Clear evidence of management commitment to encouraging a culture of openness on workplace mental health. |

Maximum achievable score 10

#### Explanatory notes

- This question is looking for a clear management commitment to encouraging a culture that supports openness on mental health.
- To score maximum points, the company should clearly state a commitment to an organisational culture which:
  - Proactively changes the way people think and act about mental health by raising awareness and challenging mental health stigma.
  - Encourages two-way conversations about mental health and highlight the support available at all stages of employment.
  - Empowers employees to champion mental health and positively role model mental health in the workplace.

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### Question 6

Does the company support the principles of good work by having a formal commitment to diversity, equity and inclusion (DEI)?

#### Rationale

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. It is good practice for companies to signal their commitment to good work through relevant workplace standards or policies.

A clear position on DEI demonstrates that a company values the benefits that differences bring and is committed to fair and equal treatment of people. A diverse work culture that resembles the diversity that exists in society can support talent attraction and retention, innovation and idea exchange, and service levels. Best practice diversity and inclusion programmes will recognise workplace mental health as a DEI issue.

#### Scoring

- |   |   |
|---|---|
| 0 | No evidence of a formal position on DEI.  |
| 1 | The company has a formal position on DEI.   |
| 3 | The company has a formal position on DEI and establishes a clear link to good work and workplace mental health. |

Maximum achievable score 3

#### Explanatory notes

- This question is looking for companies that recognise the interconnectedness between DEI and workplace mental health.
- Companies that have a clear position on DEI which explicitly links to workplace mental health are awarded full points.
- Companies that have a clear position on DEI but do not link to workplace mental health are awarded partial points.
- Group, subsidiary or market-level policies will be considered for this question.

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### Question 7

Does the company support the principles of good work by having a formal commitment to fair pay and financial wellbeing?

#### Rationale

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. It is good practice for companies to signal their commitment to good work through relevant workplace standards or policies.

Employers play an important role in improving their workforce's financial wellbeing. This includes paying people enough and fairly; offering secure, good quality jobs, and providing benefits which extend the value of their pay. It is good practice to also encourage good choices around spending, saving and investing through financial guidance, support and education.

#### Scoring

- |   |  |
|---|--|
| 0 | No evidence of a formal position on fair pay and financial wellbeing.  |
| 1 | The company has a formal position on fair pay and financial wellbeing.   |
| 3 | The company has a formal position on fair pay and financial wellbeing and establishes a clear link to workplace mental health. |

Maximum achievable score 3

#### Explanatory notes

- This question is looking for companies that recognise the interconnectedness between fair pay and financial wellbeing and workplace mental health.
- Companies that have a clear position on fair pay and financial wellbeing which explicitly links to workplace mental health are awarded full points.
- Companies that have a clear position on fair pay and financial wellbeing but do not link to workplace mental health are awarded partial points.
- Group, subsidiary or market-level policies will be considered for this question.

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### Question 8

Does the company support the principles of good work by having a formal position on board-employee information and consultation?

#### Rationale

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. It is good practice for companies to signal their commitment to good work through relevant workplace standards or policies.

Employees can thrive at work when kept informed of the strategic decisions taken by the board and when they feel that their voice is being heard by the highest decision-makers in the company. Board information and consultation involves the board not only sharing information with employees but also listening to their concerns before making key business decisions. Whilst there are certain scenarios where employers are legally obliged to inform and consult with employees (such as redundancy), companies that take a broader approach to employee consultation can cultivate an employee base that understands and values the company's particular culture and strategy.

#### Scoring

- |   |   |
|---|---|
| 0 | No evidence of a formal position on board-employee information and consultation.  |
| 1 | The company has a formal position on board-employee information and consultation.   |
| 3 | The company has a formal position on board-employee information and consultation and establishes a clear link to workplace mental health. |

Maximum achievable score 3

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**Question 8** (continued)

Does the company support the principles of good work by having a formal position on board-employee information and consultation?

**Explanatory notes**

- This question is looking for companies that recognise the interconnectedness between board-employee information and consultation and workplace mental health.
- Companies that have a clear position on board-employee information and consultation which explicitly links to workplace mental health are awarded full points.
- Companies that have a clear position on board-employee information and consultation but do not link to workplace mental health are awarded partial points.
- Group, subsidiary or market-level policies will be considered for this question.

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**Question 9**

Does the company support the principles of good work by having a formal position on flexible working?

**Rationale**

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. It is good practice for companies to signal their commitment to good work through relevant workplace standards or policies.

Flexible working can benefit all employees, including those with caring responsibilities. Workplaces that give permission to have a work/life balance and endorse flexible working allow workers greater control over balancing work commitments with non-work demands.

**Scoring**

- |   |  |
|---|--|
| 0 | No evidence of a formal position on flexible working.  |
| 1 | The company has a formal position on flexible working.   |
| 3 | The company has a formal position on flexible working and establishes a clear link to workplace mental health. |

Maximum achievable score 3

**Explanatory notes**

- This question is looking for companies that recognise the interconnectedness between flexible working and workplace mental health.
- Companies that have a clear position on flexible working which explicitly links to workplace mental health are awarded full points.
- Companies that have a clear position on flexible working but do not link to workplace mental health are awarded partial points.
- Group, subsidiary or market-level policies will be considered for this question.

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**Question 10**

Does the company support the principles of good work by having a formal position on career progression and job adjustment?

**Rationale**

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. It is good practice for companies to signal their commitment to good work through relevant workplace standards or policies.

Good workplaces support employee wellbeing throughout an individual's career by offering opportunities to progress and enhance career pathways, but also by providing opportunity to make reasonable adjustments to work schedules, duties and loads when managing mental health concerns.

**Scoring**

- |   |   |
|---|---|
| 0 | No evidence of a formal position on career progression and job adjustment.  |
| 1 | The company has a formal position on career progression and job adjustment.   |
| 3 | The company has a formal position on career progression and job adjustment and establishes a clear link to workplace mental health. |

Maximum achievable score 3

**Explanatory notes**

- This question is looking for companies that recognise the interconnectedness between career progression and job adjustment and workplace mental health.
- Companies that have a clear position on career progression and job adjustment which explicitly links to workplace mental health are awarded full points.
- Companies that have a clear position on career progression and job adjustment but do not link to workplace mental health are awarded partial points.
- Group, subsidiary or market-level policies will be considered for this question.

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**Question 11**

Does the company support the principles of good work by having a formal position on anti-bullying and non-harassment, or equivalent?

**Rationale**

Good working conditions can help to prevent new mental health problems and support those with existing conditions to get on in work and thrive. It is good practice for companies to signal their commitment to good work through relevant workplace standards or policies.

Difficult relationships at work can be stressful and make a job harder to cope with. Key frameworks and publications on workplace mental health, such as ISO 45003<sup>4</sup>, Mind's Workplace Wellbeing Index<sup>5</sup> and the Thriving at Work report agree that good work consists of the absence of bullying and harassment. Companies must have strong policy and organisational practices to mitigate the risk of these negative behaviours, and to act appropriately when incidents occur.

**Scoring**

- |   |  |
|---|--|
| 0 | No evidence of a formal position on anti-bullying and non-harassment.  |
| 1 | The company has a formal position on anti-bullying and non-harassment.   |
| 3 | The company has a formal position on anti-bullying and non-harassment and establishes a clear link to good work and workplace mental health. |

Maximum achievable score 3

**Explanatory notes**

- This question is looking for companies that recognise the interconnectedness between anti-bullying and non-harassment and workplace mental health.
- Companies that have a clear position on anti-bullying and non-harassment which explicitly links to workplace mental health are awarded full points.
- Companies that have a clear position on anti-bullying and non-harassment but do not link to workplace mental health are awarded partial points.
- Group, subsidiary or market-level policies will be considered for this question.

**Question 12**

- a) Has the company assigned board or senior management responsibility for workplace mental health?
- b) Has the company assigned day-to-day operational management responsibility for workplace mental health?

**Rationale**

When looking at the management of workplace mental health, both oversight and implementation responsibilities are important. Oversight is necessary to ensure that senior management is aware of the business implications of workplace mental health and is prepared to intervene when needed (e.g. if there are tensions between the organisation’s workplace mental health policy and other business objectives). However, it is often the case that those charged with oversight know relatively little about the specific details of how to effectively manage workplace mental health. It is, therefore, important that there are individuals responsible for ensuring that the workplace mental health policy is implemented and that workplace mental health is effectively managed.

**Scoring**

**12a. Board or senior management responsibility**

- 0 No evidence of board or senior management oversight.
- 5 The company has published details of how the board or senior management oversee the implementation of the company’s workplace mental health policy.

**12b. Day-to-day operational management responsibility**

- 0 No evidence of assigned day-to-day operational management responsibility.
- 5 The company has assigned day-to-day operational management responsibility for workplace mental health.

Maximum achievable score 10

**Explanatory notes**

- This question is looking to identify companies that demonstrate senior ownership for workplace mental health, drive board-level accountability and have a clear governance structure for management and reporting.
- The two sub-questions are scored separately (i.e. companies could score 5 points for publishing details of who is responsible for workplace mental health on a day-to-day basis and 5 points for publishing details of senior management responsibility for overseeing the workplace mental health policy).
- For the purposes of scoring on day-to-day responsibility, the question is not looking for named individuals, but evidence of roles with responsibility for workplace mental health. (e.g. a statement that this is the responsibility of a dedicated expert (medical officer), or a statement that responsibility is divided among a number of functions, with information on the various roles and responsibilities).

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**Question 13**

Has the company set objectives or targets for the management of mental health in the workplace?

**Rationale**

Objectives and targets are the point where policy commitments are translated into action, and where resources and responsibilities are allocated for the delivery of them.

**Scoring**

**0** No published objectives or targets.

**5** The company has published objectives or targets but with no or limited information on how these are to be achieved.

**10** The company has published objectives or targets and set out the steps that will be taken to achieve them.

Maximum achievable score 10

**Explanatory notes**

- This question is looking for evidence of explicit objectives or targets related to mental health and that the company has a clear plan for achieving them.
- For the purposes of scoring, we do not differentiate between objectives or targets relating to process (e.g. to formalise a company's mental health management system, to deliver training on mental health, to conduct third-party assurance) and performance (e.g. to reduce sickness absence days, to increase uptake on mental health initiatives). Similarly qualitative and/or quantitative objectives/targets are appropriate.
- Companies with multiple objectives or targets, but without further information on how these are to be achieved, are awarded partial points.
- Companies are awarded maximum points if they provide information on how the objectives or targets are to be achieved, such as specifying the main actions to be taken, by indicating the time frame or by indicating the financial and other resources required.

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**Question 14**

- a) Does the company provide mental health training to line managers?
- b) Does the company provide mental health training to dedicated individuals (e.g. mental health first aiders)?

**Rationale**

The effective implementation of a workplace mental health policy relies on managers who are competent to oversee the implementation of the policy, and dedicated individuals who are empowered to become a point of contact for those experiencing mental health issues or emotional distress and to nurture a positive influence towards mental health within the organisation generally.

**Scoring****14a. Line manager training**

**0** No evidence of training provided.

**5** Evidence of company providing specific training to line managers.

**14b. Dedicated individuals training**

**0** No evidence of training provided.

**5** Evidence of company providing specific training to dedicated individuals with assigned responsibilities for mental health (e.g. mental health first aiders).

Maximum achievable score 10

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**Question 14** (continued)

- a) Does the company provide mental health training to line managers?
- b) Does the company provide mental health training to dedicated individuals (e.g. mental health first aiders)?

**Explanatory notes**

- The questions are scored separately (i.e. companies could score maximum points in each of the two sub-questions).
- Question 14a is looking for clear evidence of training initiatives to managers to help them to be able to identify and support all aspects of mental health in the workplace.
- Question 14b is looking for clear evidence of mental health champions that are empowered to create a positive and healthy environment for workplace mental health, to be a point of contact for someone suffering from mental health concerns and to signpost for support.
- Workforce training in the form of raising awareness or education on mental health is scored separately under question 15.
- Training can be delivered by internal mental health trainers or external providers.

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**Question 15**

- a) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace?
- b) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace that extend beyond employees and contingent workers, e.g. to customers and/or suppliers?

**Rationale**

In addition to having a clear policy on mental health in the workplace, companies should develop and deliver systemic programmes of activity that raise awareness and promote understanding of mental health in the workplace.

**Scoring****15a. Awareness-raising initiatives**

- |   |  |
|---|--|
| 0 | No evidence of formal initiatives or programmes.                         |
| 1 | Evidence of a single initiative.   |
| 5 | Evidence of a single but substantial initiative or multiple initiatives. |

**15b. Awareness-raising initiatives beyond employees and contingent workers**

- |   |  |
|---|--|
| 0 | No evidence of formal initiatives or programmes.   |
| 2 | Evidence of initiatives extending beyond employees and contingent workers, e.g. to customers and/or suppliers. |

Maximum achievable score 7



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**Question 15** (continued)

- a) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace?
- b) Has the company developed formal initiatives or programmes to raise awareness of mental health in the workplace that extend beyond employees and contingent workers, e.g. to customers and/or suppliers?

**Explanatory notes**

- The sub-questions are scored separately (i.e. companies could score maximum points in each of the two sub-questions).
- This question is looking for evidence of mental health initiatives or programmes that support employees across the organisation and promote understanding of mental health in the workplace. Examples may include whole workforce training initiatives, communication campaigns, intranet mental health sites, use of technology, awareness days, etc.
- For 15a, companies that evidence a single initiative only (i.e. recognition of world mental health day) are awarded partial points. Companies that evidence multiple initiatives, or a single but substantial initiative (i.e. multi-year, organisation-wide participation events) are awarded maximum points.
- For 15b, two points are awarded to companies with value chain initiatives linked to mental health education and awareness.

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**Question 16**

Does the company provide access to mental health services and support either internally or externally?

**Rationale**

It is important for companies to provide appropriate support on mental health to workers through internal or external resources.

**Scoring**

- |   |  |
|---|--|
| 0 | No evidence of provision of mental health services.                |
| 1 | The company has published details of a single support initiative.  |
| 5 | The company has published details of multiple support initiatives. |

Maximum achievable score 5

**Explanatory notes**

- Companies that take mental health seriously will provide access to services that support mental health in the workplace. Examples can include, but are not limited to, an employee assistance programme (EAP), support lines, digital support, occupational health, NHS links, financial management in times of distress etc.
- Companies that evidence a single support service are awarded partial points.
- Companies that evidence multiple support services are awarded maximum points.

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**Question 17**

Does the company encourage openness about mental health and offer appropriate workplace adjustments to workers who require them throughout their career life cycle (e.g. during recruitment, on-boarding, career development, performance reviews and return to work)?

**Rationale**

This question is looking to assess whether companies support mental health at all points of an individual's employment from recruitment to on-boarding to career development, and will make reasonable adjustments when required.

**Scoring**

- |   |  |
|---|--|
| 0 | No evidence of mental health policy being considered at key points in career life cycle.   |
| 5 | The company talks about mental health during the career life cycle (i.e. on-boarding, career development, performance reviews and return to work). |

---

Maximum achievable score 5

**Explanatory notes**

- This question is looking for companies to adopt a holistic approach to mental health at all stages of an individual's career with the company.
- Companies are scored for their description of the processes in place to openly discuss mental health at any, or all, of the key points in an employee's career life cycle.
- Managers should be encouraged and supported to consider employee mental health at every stage of recruitment and career development.

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**Question 18**

- a) Are employees given the opportunity to directly contribute to the design or development of workplace mental health initiatives?
- b) Does the company adapt mental health programmes to local contexts?

**Rationale**

It is good practice for companies to encourage and enable employees to directly contribute to the design or development of mental health initiatives. This will strengthen a culture of openness on mental health. It is also good practice for companies to adapt mental health programmes to local contexts and workforce diversity based on an assessment of local needs.

**Scoring****18a. Employee involvement in design or development of new mental health initiatives**

- |   |   |
|---|---|
| 0 | No evidence that employees are involved in the design or development of mental health initiatives.                            |
| 5 | The company provides examples of how employees directly contribute to the design or development of mental health initiatives. |

**18b. Mental health programmes adapted to local contexts**

- |   |  |
|---|--|
| 0 | No evidence that the company adapts mental health programmes to local contexts.            |
| 5 | The company provides examples of how it adapts mental health programmes to local contexts. |

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Maximum achievable score 10

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**Question 18** (continued)

- a) Are employees given the opportunity to directly contribute to the design or development of workplace mental health initiatives?
- b) Does the company adapt mental health programmes to local contexts?

**Explanatory notes**

- The sub-questions are scored separately (i.e. companies could score points in each of the two sub-questions).
- This question aims to encourage companies to create an open and progressive culture for mental health by enabling employees to directly contribute to the design and development of effective mental health initiatives. Initiatives may be conceived through a variety of sources including but not limited to resource groups, employee networks, consultation, or business units.
- This question also asks companies to provide examples of how they meet the diverse needs of their workforce by adapting mental health programmes to local contexts.

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**Question 19**

Does the company have formal processes for measuring employee engagement (e.g. confidential pulse survey, engagement panel) and does this information support workplace mental health measurement and initiatives?

**Rationale**

Effective systems to measure employee engagement provide a near real-time measurement of employee engagement and satisfaction and can provide powerful insights to management. Meaningful employee engagement data can also support the implementation or adjustment of a company's mental health approach.

**Scoring**

- |    |  |
|----|--|
| 0  | The company provides no information on the processes in place to measure employee engagement.  |
| 5  | The company describes its formal process for measuring employee engagement but there is no clear description of how this data supports the company's mental health approach. |
| 10 | The company describes its formal process for measuring employee engagement and describes how this data supports its mental health approach.                                  |

Maximum achievable score 10

**Explanatory notes**

- This question is looking for evidence that companies are formally measuring employee engagement.
- Employee engagement surveys can highlight issues such as work overload and poor manager-employee relations which may have an adverse impact on workplace mental health. Maximum points are awarded to companies using this data to support workplace mental health.
- Companies that provide evidence of employee engagement measurement but do not describe how this data is used to inform its mental health approach are awarded partial points.
- Companies that deliver dedicated mental health surveys are awarded full points.

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**Question 20**

Does the company independently assure its mental health management system against a recognised framework or standard?

**Rationale**

Mental health assurance or accreditation schemes, against standards such as ISO 45003, provide frameworks for managing workplace mental health and support companies to progress and test their approach. They can also play an important role in promoting higher standards and driving best practice.

**Scoring**

- |    |  |
|----|--|
| 0  | No evidence of independent assurance.  |
| 3  | Evidence of third-party certification against a local country-level standard and/or evidence of preparation towards independent assurance against ISO 45003. |
| 10 | Company has achieved ISO 45003 certification by a third party.   |

Maximum achievable score 10

**Explanatory notes**

- This question recognises companies that independently assure their mental health approach against recognised frameworks and/or standards.
- Examples of local country-level standards can include but are not limited to the Mind Workplace Wellbeing Index and Mental Health America's Bell Seal for Workplace Mental Health<sup>6</sup>.
- Companies awarded maximum points for third-party ISO 45003 certification are not awarded additional points for local country-level certifications.

**Question 21**

- a) Does the company participate in industry or academic initiatives or partnerships aimed at promoting positive workplace mental health?
- b) Does the company engage customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health?

**Rationale**

Workplace mental health is a collective issue for corporations as well as being an individual issue for companies to manage. Making progress and raising standards requires individual companies to support research and development programmes to improve workplace mental health, to share their knowledge and expertise with their industry peers, to play a supportive role in public policy debates around workplace mental health, and to support industry and stakeholder initiatives directed at improving workplace mental health. Companies that share knowledge across their value chain are considered as leading the field.

**Scoring**

**21a. Company involvement in industry/academic initiatives or partnerships**

- 0 No evidence of company involvement in industry/academic initiatives or partnerships aimed at promoting positive mental health in the workplace.
- 5 Evidence of company involvement in one industry/academic initiative or partnership aimed at promoting positive mental health in the workplace.
- 10 Evidence of company involvement in multiple industry/academic initiatives or single significant industry/academic partnership aimed at promoting positive mental health in the workplace.

**21b. Customer and/or supplier engagement in initiatives or programmes aimed at promoting positive mental health in the workplace**

- 0 No evidence of engagement provided.
- 2 Evidence of extending engagement of customers and/or suppliers in initiatives or programmes aimed at promoting positive mental health.

Maximum achievable score 12

**Explanatory notes**

- The sub-questions are scored separately (i.e. companies could score maximum points in each of the two sub-questions).
- Only those industry or academic initiatives or partnerships that are explicitly directed at improving mental health in the workplace are eligible to be scored. Academic partnerships should typically extend beyond the company’s own operations.
- For 21a, in order to receive a score of 10 points, it is necessary for companies to demonstrate not only that the initiatives had a meaningful mental health dimension but that the company had played a significant role in the initiative. That is, companies have to demonstrate that they are dedicating significant time, resources or expertise to the initiatives in question.
- For 21b, companies can score two points for publishing details of initiatives and partnerships delivered across the value chain (i.e. customers, suppliers, communities.)

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**Question 22**

Does the company provide examples of employee communications on workplace mental health?

**Rationale**

Openness and transparency on mental health should be seen across the organisation. Providing opportunities for employees to share personal stories and participate in internal campaigns will engage employees and other audiences on the issue of mental health.

**Scoring**

- |    |  |
|----|--|
| 0  | No evidence of employee communications on mental health.   |
| 5  | At least one example of employee communications on workplace mental health.  |
| 10 | Substantial employee communication or multiple examples of continuous and sustained communications on workplace mental health. |

Maximum achievable score 10

**Explanatory notes**

- This question is looking for companies to encourage communication on mental health. This is not just about providing information in the corporate responsibility or people section of the company website but making mental health an integral part of employee communications and engagement.
- The activities that could be considered in this question are broadly defined. Examples include but are not limited to:
  - Employee communications featured on the company's website or in a report.
  - Social media campaigns.
  - Published case studies.
- In order to receive a score of 5 or 10, the focus of activities must relate to mental health.
- Substantial communication (e.g. publicly-accessible online employee portal on mental health) is given equal scoring to multiple continuous and sustained communications.
- Social media channels referenced by corporate website are reviewed for recent content (less than 12 months old).

# Performance reporting and impact

## Question 23

Does the company publish details of its mental health approach in its annual report and accounts (or equivalent)?

### Rationale

The annual report is a key channel for corporate disclosure. It is made available to shareholders and other stakeholders who use it to evaluate a company's performance and to make investment decisions. Companies are expected to publish details of their workplace mental health strategy and practices so that investors and other interested parties can appraise their approaches.

### Scoring

- |    |  |
|----|--|
| 0  | No reporting on workplace mental health in the annual report.                        |
| 5  | The company provides some reporting on workplace mental health in the annual report. |
| 10 | The company reports comprehensively on workplace mental health in the annual report. |

Maximum achievable score 10

### Explanatory notes

- This question is looking for companies to signal their position on mental health with appropriate disclosure of their workplace mental health strategy and/or practices in the annual report and accounts (or equivalent).
- Maximum points are only awarded if the company is explicit about the commitments and actions that have been taken to safeguard and support workplace mental health, including:
  - Expressed management commitment to workplace mental health.
  - A clear position regarding expected standards of workplace mental health – valuing mental health equally with physical health.
  - Describing the governance framework for workplace mental health strategy (e.g. board and senior management oversight).
  - A commitment to continuous improvement and public reporting on performance.

## Question 24

Does the company report on progress against its objectives or targets related to mental health?

### Rationale

In addition to having clear policy commitments and management practices, companies are expected to develop reporting criteria for workplace mental health and publish details of progress made against objectives or targets set. Examples can include (but are not limited to) development of initiatives, expansion of communication programme around mental health, EAP uptake, use of apps, response rates to mental health surveys, reduction in absence days.

### Scoring

- |    |  |
|----|--|
| 0  | No reporting on progress against objectives or targets related to mental health.                         |
| 5  | Partial reporting on progress against all relevant objectives or targets related to mental health.       |
| 10 | Comprehensive reporting on progress against all relevant objectives or targets related to mental health. |

Maximum achievable score 10

### Explanatory notes

- This question is only scored if question 13 is met fully or partially.
- This question is looking specifically for explicit monitoring data. This can be quantitative (i.e. x% of people trained in mental health awareness) or qualitative (development of support activities), and based on process or performance.



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**Question 25**

- a) Does the company report on the proportion of line managers that are trained in workplace mental health?
- b) Does the company report on the proportion of dedicated individuals that are trained in workplace mental health?

**Rationale**

The effective implementation of mental health strategy and practices relies on managers, and other dedicated individuals, who are competent and confident to oversee delivery initiatives and to support people to talk more freely about their mental health, reducing stigma and promoting early intervention. An educational programme for employees supports awareness of, and a positive culture for, mental health.

**Scoring****25a. Proportion of line managers trained**

- 0 No reporting.
- 5 The company reports on the proportion of line managers trained in workplace mental health.

**25b. Proportion of dedicated individuals trained**

- 0 No reporting.
- 5 The company reports on the proportion of dedicated individuals trained in workplace mental health.

Maximum achievable score 10

**Explanatory notes**

- Questions are scored separately.
- This question is looking for explicit reporting of the number of people trained in mental health. It is helpful if companies express this data as a proportion of the total number of employees (e.g. 500 people received training (5% of the workforce))

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**Question 26**

Does the company report on the uptake of its mental health programmes or initiatives?

**Rationale**

The effective implementation of mental health strategy relies on the active participation of the workforce in initiatives and programmes.

**Scoring**

- 0 No reporting on the uptake of mental health programmes or initiatives.
- 5 Reporting on the uptake of a single mental health programme or initiative.
- 10 Reporting on the uptake of multiple mental health programmes or initiatives.

Maximum achievable score 10

**Explanatory notes**

- This question is looking for explicit reporting of the number of people accessing mental health initiatives and programmes. Examples might include but are not limited to the number of people using apps, actively taking part in awareness days, attending awareness sessions, etc.
- Companies that report on the uptake of a single programme or initiative are awarded partial points.
- Companies that report on the uptake of multiple programmes or initiatives are awarded maximum points.

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**Question 27**

Does the company use key performance indicator(s) to measure and report on the impact of its workplace mental health strategy?

**Rationale**

Companies that identify the importance of good workplace mental health and adopt appropriate strategies and practices which positively impact workplace mental health are encouraged to develop metrics to demonstrate performance. Examples may include but are not limited to return on investment (ROI) linked to mental health strategy and initiatives, reduction in sickness absence, turnover, morale, etc.

**Scoring**

0 No evidence of impact reporting related to mental health strategy.

10 The company reports on the impact of its mental health strategy.

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Maximum achievable score 10

**Explanatory notes**

- This question is looking for explicit reporting of results that have been determined as indicating the effectiveness of the workplace mental health strategy.
- Companies are expected to determine appropriate key performance indicators linked to their business case for mental health (ROI, turnover, morale, engagement, absence days).

# Endnotes

- 1 Stevenson, D. and Farmer, P. (2017), 'Thriving at work: the Stevenson/Farmer review of mental health and employers'. Online at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/658145/thriving-at-work-stevenson-farmer-review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/658145/thriving-at-work-stevenson-farmer-review.pdf)
- 2 World Health Organization (2022), 'WHO guidelines on mental health at work'. Online at [www.who.int/publications/i/item/9789240053052](http://www.who.int/publications/i/item/9789240053052)
- 3 World Health Organization and International Labour Organization (2022), 'Mental health at work: policy brief'. Online at [www.who.int/publications/i/item/9789240057944](http://www.who.int/publications/i/item/9789240057944)
- 4 International Organization for Standardization (ISO) (2021), 'ISO 45003:2021 – occupational health and safety management – psychological health and safety at work – Guidelines for managing psychosocial risks'. Online at [www.iso.org/obp/ui/#iso:std:iso:45003:ed-1:v1:en](http://www.iso.org/obp/ui/#iso:std:iso:45003:ed-1:v1:en)
- 5 Mind, 'Workplace Wellbeing Index'. Online at [www.mind.org.uk/workplace/workplace-wellbeing-index](http://www.mind.org.uk/workplace/workplace-wellbeing-index)
- 6 Mental Health America, 'The Bell Seal for Workplace Mental Health'. Online at [www.mhanational.org/bestemployers](http://www.mhanational.org/bestemployers)

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