Australian Government

National Mental Health Commission

Consultation on the draft National Workplace Initiative core framework

July 2020

Consultation overview

We are inviting you to help us shape the core framework within the National Workplace Initiative (NWI). The NWI aims to create a nationally consistent approach to mentally healthy workplaces. The attached framework will act as the centerpiece of the NWI, informing the scope, resources, tools and supports provided within the NWI.

The National Mental Health Commission (NMHC) aims to work collaboratively with businesses, workers, people with lived experience, providers, agencies and other workplace stakeholders to shape the NWI. By working closely with you to develop the NWI, we believe the NWI will provide a unique opportunity to create positive change for Australian people, businesses and industries.

About the National Workplace Initiative

In the 2019-20 Federal Budget, the Government announced an investment of $11.5 million over four years for the NWI. The NWI will provide a nationally consistent approach to mentally healthy workplaces. In particular, the NWI will:

- Create an evidence-based framework for mentally healthy workplaces.
- Help people find suitable initiatives and resources via a digital NWI platform.
- Showcase successful approaches to mentally healthy workplaces.
- Strengthen the many programs and interventions already underway in Australia.

The NMHC is leading the creation of the NWI with the support of the Mentally Healthy Workplace Alliance (Alliance). The Alliance consists of 15 national organisations leading change to promote and create mentally healthy workplaces for all Australians. Members of the Alliance include peak organisations from business, union, mental health and government sectors.

Do we need another mentally healthy workplace framework?

There are already several mentally healthy workplace frameworks freely available to Australian businesses. Many of these are grounded in research evidence and tailored through consultation with intended users. This diversity provides businesses with an opportunity to select from a range of frameworks to identify the one that best matches their context and requirements. However, the abundance of frameworks can also be confusing and overwhelming, with little guidance on how to select the "right" framework. Slight variations in language, priority areas and domains of focus across these frameworks also creates a challenge for businesses aiming to understand how various resources and services align with broader strategic initiatives.

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Purpose of the NWI core framework

The NWI core framework aims to define the essential domains for creating and maintaining healthy workplaces to unify existing and future mentally healthy frameworks. This framework will be relevant to all Australian businesses regardless of size, industry and location. It will create a common language to show how various existing and future frameworks, information, resources, tools and services fit together within a coherent, whole-of-business approach. It will also inform the design of digital platforms, tools, resources and expert supports that will be created as part of the NWI.

The discussion paper attached below provides more detail about the thinking behind the NWI core framework to date.

Iterative design

One of the key principles of the NWI project is working closely with the people who will use the NWI to make sure it is designed to be fit for purpose. By showing you our early thinking, drafts and prototypes we can understand what is likely to work and not work. It means we can shift our approach quickly if needed and continually refine our thinking about the NWI.

This is the first of many opportunities to provide feedback to help shape the NWI. By providing your feedback on the draft NWI core framework and joining our online feedback community, you can play a key role in shaping the future of mentally healthy workplaces.

Feedback wanted

What you see in the discussion paper below is not a final product. We aim to provide you with enough information to start a rigorous discussion and provide informed feedback. In addition to general feedback, we have highlighted some areas where we would like some more in-depth feedback.

Throughout this paper we have signposted the questions we are seeking specific feedback on as they will be listed in the feedback survey. We also welcome any additional feedback or discussions through one of the contact details listed below. There is no need for a formal submission at this point, you can submit ideas anonymously, on behalf of a group or just as an interested individual.

How to provide feedback

After reading the discussion paper below, we would love to hear your thoughts via our online feedback survey:

https://consultation.mentalhealthcommission.gov.au/policy-projects/nwi-core-framework

This survey also allows anonymous feedback.

You can also provide feedback or get in touch with the team via:
Email: nwi@mentalhealthcommission.gov.au
Mail: NWI feedback, National Mental Health Commission,
                       PO Box R1463, Royal Exchange NSW 1225.
Phone: Dr Erica Crome, Project Director (02) 8229 7537

*We appreciate receiving your feedback by **August 16th 2020***

Discussion paper for feedback on the NWI core framework

1. Executive Summary

To remain equally relevant for all businesses, the proposed National Workplace Initiative (NWI) core framework will focus on the three key domains that need to be present to create a mentally healthy workplace. The identified domains currently encompass:

- Support recovery
- Prevent harm
- Promote wellbeing through positive elements of work

The framework is anticipated to include critical success factors relevant to all businesses such as the need for continual improvement, measurement and commitment to action. The framework will also stress the importance for action at various levels of influence, from an individual level through to industry-wide approaches.

Finer level details related to implementation have been purposely left out from the NWI core framework. This is because there is anticipated to be wide variation in the relevance of different implementation approaches or sub-domains across workplaces that could confuse or overwhelm businesses. Instead, these elements will come to life through the pathways within the digital NWI platform and supporting programs (e.g. expert support, achievement schemes).

Other factors such as physical health and the impact of workplace context, including supply chains, will be acknowledged as important. However, they will not be explicitly included within the NWI Core Framework given wide variations in these across businesses and the potential for these factors to detract from core action areas related to mental health.

2. Purpose of the NWI core framework

The NWI aims to establish a nationally consistent approach to creating mentally healthy workplaces. In order to achieve consistency in approach, the NWI needs to be built on a mentally healthy workplace framework that is equally relevant to all Australian businesses, from micro businesses and gig workers through to large public service agencies and multinational corporations.

The term framework can mean many things, including a basic structure around which something can be built, or a system of rules, ideas or principles to assist in planning or decision making[1]. There is a wide range of existing frameworks for mentally healthy workplaces, from management systems like the National Standard of Canada for Psychological Health and Safety in the Workplace through to high-level frameworks such as the Thrive at Work or the Integrated Approach that can be reflected diagrammatically on a page.

There is no definitive guide to what is or is not included in a framework, so the NWI has taken a practical approach to defining the NWI core framework to ensure it is relevant and easy to understand for all businesses.

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[1] Cambridge dictionary, https://dictionary.cambridge.org/

Based on consultations to date, we believe a nationally consistent framework should act as:

- A compass that orients people to important areas of focus.
- An organising structure that sets the scope for action on mentally healthy workplaces.
- A document that unifies and clarifies people's understanding of mentally healthy workplaces and gives them a language to speak about the subject consistently and confidently.
- A centrepiece for services and supports including a digital platform, an accreditation or benchmarking system and expert advice and implementation support.
- A roadmap for potential, which shifts thinking beyond simply aiming to be compliant with workplace health and safety legislation to more aspirational states.
- A tool to socialise the need for continual improvement, rather than focusing on a silver bullet.

It is also important to consider what should not be included in a national framework. The following have been excluded from the NWI core framework:

- Information about implementation or "how to do" things that is not equally relevant to all Australian businesses.
- Prescriptive advice that may stifle innovation by giving a sense there is a single approach to change.
- Descriptions about "who" should be accountable for various aspects of mentally healthy workplaces as this is also likely to vary across businesses and industries.
- Advice about legislated responsibilities, as this varies across jurisdictions and is out of scope of the NWI.
- Descriptions about directional or causal relationships as the relationships between domains, individuals, organisations and their broader context is complex and multi-directional.
- Dense, technical language that requires a high level of education or training to interpret.

Therefore, overall, the NWI core framework will orient Australian businesses to the key domains of mentally healthy workplaces without overwhelming them.

Consultation question 1:
How much do you agree with this approach to what is and is not included in the NWI core framework?

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3. A compass to core domains

By defining the core domains, we are clarifying the necessary and sufficient elements of any mentally healthy workplace blueprint, whilst allowing flexibility to adapt these to different contexts. This is similar to the concept that every house shares some combination of bathroom, kitchen, bedroom and living spaces. However, the size, combination and layout of these common elements varies for each household based on their need from the smallest studio apartment through to the largest mansion.

Within many existing frameworks for mentally healthy workplaces, there are comparable core domains to those outlined below. These span a continuum of positive wellbeing for individuals and businesses through to support for current mental ill-health. This continuum of focus is also comparable to public health principles of primary, secondary and tertiary intervention.

Together, the core NWI Framework aims to guide and educate businesses about the core domains for action, create clear parameters about the scope of the NWI and sets expectations about the importance of continual improvement.

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Consultation question 2:
How relevant are the proposed domains of this framework (detailed below) for all Australian businesses?

Consultation question 3:
Are there important areas that this framework misses out that are relevant to all Australian businesses?

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The three domains identified as essential and relevant through research and consultations to date include:

a. Domain 1: Support recovery

This core domain refers to the creation of a stigma-free culture that supports help seeking, early intervention, management and recovery of mental ill-health, regardless of cause.

Actions within this domain include increasing awareness and understanding of mental ill-health, reducing stigma, training managers and leaders to support intervention and recovery, providing access to and/or supporting uptake of early intervention, injury management, recover at work / return to work supports and employee assistance programs.

Businesses moving beyond legislated requirements to excel in this domain understand the health benefits of good work and support people to stay at work during periods of mental ill-health. This also extends to proactive support for people away from work with physical injuries to eliminate or minimise secondary psychological injury. Businesses excelling in this domain also understand how incorporating mental health within diversity and inclusion initiatives strengthens their business and supports the many Australians who will experience mental ill-health at some point in their lifetime.

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Consultation question 4:
Is there another term aside from "support recovery" that would better capture the intent of Domain 1?

Consultation question 5:
What are the sub-domains or key considerations that should sit under Domain 1?

Consultation question 6:
Should early intervention sit within this domain, or should this sit as an independent fourth domain?

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b. Domain 2: Prevent harm

This core domain focuses on the proactive identification and elimination of exposure to things that can create mental ill-health (e.g. psychosocial hazards) and minimisation and mitigation of risks that cannot be removed from work.

Actions associated with this domain include healthy and safe work design, management and resourcing, proactive identification, elimination and mitigation of psychosocial hazards and risks, enhancing organisational and individual resilience to challenges, and being aware of legislated obligations. Preventing harm extends beyond workplace health and safety to include capacity development in management, human resources and operations functions.

Businesses moving beyond legislated requirements to excel in this domain create healthy workplace cultures, adopt a zero-tolerance approach to bullying and ensure people are appropriately trained, resourced and supported in their roles.

> Consultation question 7:
> **Is there another term aside from "prevent harm" that would better capture the intent of Domain 2?**
>
> Consultation question 8:
> **What are the sub-domains or key considerations that sit under Domain 2?**

c. Domain 3: Promote wellbeing through positive elements of work

This core domain extends beyond compliance to the purposeful improvement of the quality of work, bringing out the best for both workers and businesses. The aspiration of this domain is creating an environment and work that recognises and amplifies the positive aspects of work to help individuals and businesses thrive.

Actions associated with this domain include optimising workplace cultures, providing opportunities for growth and development, ensuring opportunities to make meaningful contributions, providing strengths-based development and supporting meaningful connections at work.

> Consultation question 9:
> **Is there another term aside from "Promote wellbeing through positive elements of work" that would better capture the intent of Domain 3?**
>
> Consultation question 10:
> **What are the sub-domains or key considerations that sit under Domain 3?**

4. Critical success factors rather than implementation

As every business is different, we can expect the ideal implementation of this framework to also look different in every workplace. By allowing flexibility in implementation, businesses are empowered to co-design, innovate, select relevant tools and feel ownership over their efforts to become more mentally healthy.

Amidst differences in potential implementation approaches, there are critical success factors that all businesses should consider in how they apply the NWI core framework. These include:

- Building commitment to, and a plan for, action across the business.
- Adopting a continual improvement approach, with small and regular steps to improve.
- Using measurement and data to guide decisions and actions.
- Assigning clear accountability for actions and outcomes.
- Engaging people impacted in co-design to adapt this approach to match unique business contexts.

Consultation question 11:
Are there other critical success factors not listed here that are relevant to all Australian businesses?

5. Action at all levels, from industries to individuals

The concepts detailed above are relevant for individuals, teams, businesses and industries. The NWI core framework acknowledges that mentally healthy workplaces require action at a range of system levels. For instance, even the most resilient individual will be impacted by unhealthy environments, and likewise, systems will not change without individuals taking action. Therefore, the NWI core framework and supporting initiatives will emphasise the importance of action at all levels – from industries through to individuals.

Industries can support action by creating a shared framework that extends across many businesses. This is particularly important in industries with higher risk profiles, frequent sub-contracting arrangements, a higher volume of small businesses with limited individual resources or higher rates of turnover and movement between employers. Examples of industry level frameworks and initiatives include Mates in Construction and the AFL Mental Health Framework.

Within businesses, action is required at the business level, at a team level and individual level. The relevance and importance of these levels will depend on business size, with larger organisations needing to invest more heavily in initiatives that creative supportive cultures, systems and processes. Smaller businesses will find more dynamic team or individual approaches more relevant.

Consultation question 12:
Do you have feedback or comments on the "action at all levels" approach?

6. Acknowledge, but not explicitly include physical and financial health

Mental health is inextricably linked with other domains such as physical health and financial wellbeing. Work environments that are not physically safe are challenging to make mentally healthy. Workers who are experiencing poor physical or financial health may find it difficult to thrive at work.

There are advantages to explicitly including physical health in the core framework, such as demonstrating parity of mental and physical health, consistency with WHS legislation and acknowledging the interconnectedness of these states. However, there are also downsides to including physical health including businesses focusing more on what they already feel comfortable with,

overwhelming businesses with the scope of the framework and diluting the importance of mental health amongst other domains.

Considering this balance of advantages and disadvantages together, the NWI core framework will not extend to include physical and financial health. Instead it will acknowledge the importance of these alongside mental health. In future, when the uptake of the mental health elements of the NWI is sufficiently high, the domains are structured in a way they can easily expand to include elements of physical and financial health.

Consultation question 13:
Do you agree with the approach of acknowledging but not explicitly including physical and financial health?

7. Supply chains and context are important, but suited more for implementation

The NWI core framework recognises supply chains, customers, clients and ecosystems strongly influence mentally healthy workplaces. However, the complexity, level of control and influence, and the dependency on external context is likely to vary from business to business. Therefore, contextual factors such as supply chains will be acknowledged in the NWI core framework, however, specific advice on mentally healthy supply chains will not be included in the NWI core framework. These issues will instead be better suited for industry, location or context specific elements of the NWI.

Consultation question 14:
Do you agree with the approach of reserving contextual factors, such as supply chains, for more bespoke policies, programs and initiatives?

8. Future activities to refine the NWI core framework

In taking an iterative approach to building out this framework, we identify that there are still many areas of this framework that need to be refined. This includes the language of this framework and defining the boundaries of what is included and not included in the final version. After this consultation, we will:

- Integrate and act on feedback received in this consultation.
- Refine the language of this framework using a co-design approach.
- Finalise how the concepts in this NWI core framework are best presented in a way that is relevant and easily accessible to a range of different audiences.
- Conduct a public consultation on the final draft of the NWI core framework.

We thank you for being part of one of the first rounds of feedback on this approach, and we look forward to refining the NWI with you in future.

Please provide your email address in your response, or register your interest at https://www.mentalhealthcommission.gov.au/Mental-health-Reform/National-Workplace-Initiative to remain up to date with future versions of this framework and to take part in a range of other feedback activities for the NWI.